

TSD File Inventory Index

Date: October 3, 2002

Initial: CMK/monas

Facility Name: <u>Reichhold Chemicals, Inc. (Fondale)</u>			
Facility Identification Number: <u>MID 020 087 128</u>			
A.1 General Correspondence <u>A.1.1-A.1.5-A.1.8</u>	1	B.2 Permit Docket (B.1.2)	
A.2 Part A / Interim Status <u>A.2</u>	1	.1 Correspondence	
.1 Correspondence	Y	.2 All Other Permitting Documents (Not Part of the ARA)	
.2 Notification and Acknowledgment	Y	C.1 Compliance - (Inspection Reports) <u>See C.1</u>	
.3 Part A Application and Amendments	Y	C.2 Compliance/Enforcement <u>C.2</u>	1
.4 Financial Insurance (Sudden, Non Sudden)		.1 Land Disposal Restriction Notifications	
.5 Change Under Interim Status Requests		.2 Import/Export Notifications	
.6 Annual and Biennial Reports	X	C.3 FOIA Exemptions - Non-Releasable Documents <u>C.3</u>	1
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.2 Reports		.2 Background Reports, Supporting Docs and Studies	
A.4 Closure/Post Closure		.3 State Prelim. Investigation Memos	
.1 Correspondence <u>A.4.1-A.4.5</u>	1	.4 RFA Reports <u>D.1.4</u>	1
.2 Closure/Post Closure Plans, Certificates, etc <u>A.4.2</u>	1	D.2 Corrective Action/Facility Investigation	
A.5 Ambient Air Monitoring		.1 RFI Correspondence	
.1 Correspondence		.2 RFI Workplan <u>D.2.2</u>	1
.2 Reports		.3 RFI Program Reports and Oversight	
B.1 Administrative Record		.4 RFI Draft /Final Report	

Total = 10

.5 RFI QAPP		.7 Lab data, Soil Sampling/Groundwater	
.6 RFI QAPP Correspondence		.8 Progress Reports	
.7 Lab Data, Soil-Sampling/Groundwater D-2.7	1	D.5 Corrective Action/Enforcement	
.8 RFI Progress Reports		.1 Administrative Record 3008(h) Order	
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D.3 Corrective Action/Remediation Study		.1 Forms/Checklists	
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.3 CMS Workplan		.2 Reports	
.4 CMS Draft/Final Report		F Imagery/Special Studies (Videos, photos, disks, maps, blueprints, drawings, and other special materials.)	1
.5 Stabilization		G.1 Risk Assessment	
.6 CMS Progress Reports		.1 Human/Ecological Assessment	
.7 Lab Data, Soil-Sampling/Groundwater		.2 Compliance and Enforcement	
D.4 Corrective Action Remediation Implementation		.3 Enforcement Confidential	
.1 CMI Correspondence		.4 Ecological - Administrative Record	
.2 CMI Workplan		.5 Permitting	
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.4 CMI Draft/Final Reports		.7 Corrective Action/Remediation Implementation	
.5 CMI QAPP		.8 Endangered Species Act	
.6 CMI Correspondence		.9 Environmental Justice	

Note: Transmittal Letter to Be Included with Reports.

Comments: _____

STATE OF MICHIGAN



JOHN ENGLER, Governor

DEPARTMENT OF NATURAL RESOURCES

John Hannah Building, P.O. Box 30241, Lansing, MI 48909

ROLAND HARMES, Director

May 31, 1994

Ms. Janet Narich
Fern/Ridge Environmental Coalition
706 Pinecrest
Ferndale, Michigan 48220

Office
WASTE MANAGEMENT DIVISION
EPA REGION 5

Dear Ms. Narich:

SUBJECT: Reichhold Chemicals, Inc.

Thank you for your letter of May 10, 1994 expressing the concerns your group and other members of the community have about the Reichhold Chemicals, Inc. (Reichhold) facility. Director Harmes has asked me to respond on his behalf.

The Michigan Department of Natural Resources (MDNR) shares your concerns regarding this facility and intends to see that Reichhold properly meets its obligations to fully characterize and remediate any contamination at or emanating from its Ferndale, Michigan facility. Reichhold, as the operator of hazardous waste storage facilities, is subject to the Corrective Action authorities of the Michigan Hazardous Waste Management Act, 1979 PA 64, as amended (Act 64), and the federal Resource Conservation and Recovery Act, 42 USC 6901 et seq. (RCRA). At both the state and federal level, the Corrective Action programs are technically very complex and are in their infancy, with comparatively few orders having been entered or issued. The MDNR has recently promulgated new amendments to the Act 64 Rules regarding Corrective Action requirements which, when effective, will improve MDNR's ability to bring about the timely implementation of corrective actions at facilities where these actions are necessary.

As you know MDNR staff, with support from Attorney General personnel, have been actively negotiating the terms of a Corrective Action Consent Order (CACO) with Reichhold representatives. This CACO, when entered, will establish enforceable schedules for the completion of RCRA Facility Investigations (RFI) to determine the full vertical and horizontal extent of any soils or groundwater impacts resulting from Reichhold's activities, irrespective of whether contaminants have migrated off Reichhold's property. In addition, the CACO will require Reichhold to perform a Corrective Measures Study to identify the appropriate remedial approach or approaches best suited for the conditions at the site. Finally, the CACO will require the implementation of Interim Measures at specific areas of contamination to prevent further migration of contaminants. Due to the as yet undefined nature of the site, Reichhold and MDNR have agreed that Reichhold's final implementation of site-wide Corrective Measures will be the subject of a future Order. Negotiations of the CACO are in their final stages and MDNR staff are hopeful that the CACO will be entered in the near future. In the



event that negotiations break down, MDNR is prepared to issue a unilateral order to require these and other actions by Reichhold.

Your description of the known site conditions is generally accurate. Initial investigations have not yet delineated the horizontal and vertical extent of any soils or groundwater impacts. It should be noted, however, that the interim measures systems described in your letter, the non-aqueous phase liquid (NAPL) recovery unit and the soil vapor extraction system are operational. The NAPL recovery unit is pumped intermittently as material accumulates slowly in the collection sump. The next pumping of this system is scheduled for this summer. Similarly, the soil vapor extraction system, which had been shut down for modifications to improve its effectiveness, will be put back into operation in the next few weeks. The need for additional interim measures will be evaluated concurrent with the performance of the RFI and if necessary, MDNR will require implementation of such measures.

With respect to your concerns regarding the activities of Reichhold's current tenant in the facility, Recycle Center, Inc. (RCI), it should be noted that the business arrangements between Reichhold and RCI are generally beyond the scope of MDNR's legal authority to influence. Nonetheless, MDNR has informed Reichhold that it must more carefully monitor RCI's activities, that any new environmental violations that occur at the site will result in further enforcement actions, and that any interference with Reichhold's performance of its corrective action obligations will not be tolerated.

Your concerns regarding the potential health effects of exposure to site contaminants are recognized, but are beyond the technical capabilities of MDNR to properly evaluate. Your concerns are being forwarded to the Oakland County Health Department and the Michigan Department of Public Health (MDPH) for their consideration and follow-up, as appropriate.

Your concerns regarding the economic effects proximity to the Reichhold site may have on local property values are an example of the complexity of the issues involved with sites of this nature. The MDNR firmly believes that the best way to resolve these concerns is through the performance of appropriate corrective actions by the parties responsible for the environmental conditions at and in the vicinity of the site.

Finally, regarding MDNR's participation in a public meeting regarding this matter, MDNR has accepted an invitation from the City of Ferndale to participate in such a meeting. It is my understanding that this meeting has been tentatively scheduled for the evening of June 23, 1994.

I again wish to express my thanks for sharing your concerns. I recognize that the pace of actions at this site has not been as rapid as your group would like, but must note that MDNR has proceeded as rapidly as the technical and administrative complexities of this situation have allowed. With the continued support of groups like yours and others, I believe we can bring about the necessary actions at the site in a fashion that assures that human health and the environment are protected.

Ms. Janet Narich

-3-

May 31, 1994

I hope that this adequately responds to your concerns. If you have any questions, please feel free to contact Mr. Phil Schrantz of my staff at 517-335-4709, or me.

Sincerely,



Jim Sygo, Chief
Waste Management Division
517-373-9523

cc: U.S. Representative Sander Levin
State Representative David Gubow
Mr. Valdis Adamkus, Region 5, U.S. EPA
Ms. LeAnne Redick, Governor's Washington Office
Mr. Jess Soltess, City of Ferndale
Mr. Joe Merucci, City of Pleasant Ridge
Mr. James Bedford, MDPH
Director Roland Harmes
Mr. Ed Hagan, MDNR
Dr. Ben Okwumabua, MDNR
Mr. Steve Buda/Mr. Dan Dailey, MDNR
Ms. JoAnn Merrick/Mr. Phil Schrantz, MDNR

De

MICHIGAN DEPARTMENT OF NATURAL RESOURCES

INTEROFFICE COMMUNICATION

January 31, 1994

TO: Phil Schrantz
Compliance & Enforcement Section, WMD

FROM: David Slayton
Technical Support Unit, WMD

SUBJECT: Proposed Consent Order
Reichhold Chemical
MID 020 087 128

I have reviewed the proposed consent order dated 1/26/94 that was received from Mr. Voelpel. I have the following comments:

1. Paragraphs 16, 23: Dropping the term "SWMU" and using WMU would seem to make it difficult to show equivalence to HSWA. How could we refer to regulations (ie. 264.101) and guidance that use the term?
2. Paragraph 23, 24: If the term "WMU" is used, where is waste defined? Does this paragraph mean that only something that is a waste is applicable? How does this affect cleanup of "product" and the definition of "routine and systematic"?
3. Paragraph 27.A.1 and A.3: Why abbreviate trichloroethane to TCA when none of the other chemicals are?
4. Paragraph 27.B.2: Soil-gas Vapor results from the West Section also have concentrations greater than 2000 ppm just like the ones described in 27.B.1. The West Section should be described the same way.
5. Paragraph 27: A more recent Hydrogeological Investigation has been done at the site, and it could be included here. The report is titled "Interim Phase II Investigation Report" and is dated January 1992.
6. Paragraph 33: Will the definition of "contaminant" allow the DNR to require work on product spills (similar question to my number 2). Will Act 307 Type B numbers apply as the cleanup standard?
7. Paragraph 34: If all references to guidance documents are dropped, how would we enforce current minimum guidelines for HSWA?
8. Paragraph 35.F: On page 38, if this paragraph is dropped, would the company be required to initiate new interim measures? Where in the order does DNR have authority to request or require new interim measures? Or

is that something we can do outside of the order?

9. Paragraph 79: I don't know how any of these actions can be deemed "consistent" with RCRA when many of the references to HSWA guidance documents and terms are removed from the order. This also sounds like total absolution from any potential enforcement actions. This paragraph should not be included.

In general, the tone seems to be that they will have to comply with the HSWA regulations on corrective action because the DNR will be reviewing the documents. The attempt seems to be to dilute this as much as possible. We have to show equivalence to HSWA, or the chances of EPA overfiling actually go up, not down. If you have any questions, please contact me.

cc: Mr. Dan Dailey, DNR
Ms. De Montgomery, DNR

David Stoffer

De

MICHIGAN DEPARTMENT OF NATURAL RESOURCES

INTEROFFICE COMMUNICATION

January 19, 1994

TO: Dan Dailey
H.W. Permits Unit, WMD

FROM: David Slayton
Technical Support Unit, WMD

SUBJECT: RFI Draft Workplan
Reichhold Chemical, Inc.
MID 020 087 128

RECEIVED
WMD RECORD CENTER

JUN 24 1994

I have completed my preliminary review of the draft RFI Work Plan for Reichhold Chemical dated August 13, 1993. The Work Plan consists of three volumes: the Work Plan, Description of Current Conditions, and Quality Assurance Plan.

We should discuss whether or not we want Reichhold to respond to this "preliminary" review with a revised draft of the three volumes, or just have them wait until after they receive our complete technical review comments. I think I'd rather have them wait to get all of our comments, then the one they submit should be ready to go, instead of having an intermediate one. My preliminary review comments are listed below for each volume:

WORK PLAN

1. Section 3 does not address possible migration of contamination past the Reichhold property boundaries. This possibility must be addressed as either a direct part of this study, or as a second phase based on the results of this study. Possible methods of off-site investigation that would cause minimum disruption could include a soil gas survey (with a photo-ionization meter, or portable GC) and/or ECP.
2. In Section 3.04, conducting shallow soil sampling under the buildings should not be based solely on the condition of the floor. The floor could have been repaired or replaced, contamination could migrate under buildings, or the building could have been built over an existing problem. In order to avoid future surprises and develop as complete a picture as possible, soil gas samples on some sort of a grid should be done through holes drilled in the floors. This would be in addition to the possible soil samples.
3. In Section 3.08, existing wells should be checked for NAPL when they are sampled. There are known DNAPL's, and the possibility exists for LNAPL also.

4. The Section 6 Community Relations Plan should be strengthened. First, copies of the same material that is going to the Ferndale Public Library should also go the Pleasant Ridge Library if there is one. The residents directly to the west are in Pleasant Ridge. Second, even though copies will be available at the libraries, no one would know they are there except city officials. Perhaps there should be a public notice in papers as to the availability of the documents when the order is signed. We could request the company or city to hold an information meeting at which time a mailing list could be started. We could request that the company hire a consultant that can do a mass mailing to adjacent residences telling about the library copies, or giving them a chance to sign up for a mailing list. A first time informational mailing would be important to explain the plant is closed, all chemicals are removed, the plant has been decommissioned and cleaned, an order was signed, some cleanup work is underway, more studies and remediation activities are planned.
5. Table 3 describes the proposed method of investigation for each of the SWMU's. For SWMU's 2 and 3, I don't think any soil gas survey was done in previous studies (South Area, buildings 203 and 204). Given that this was a product storage and handling area, I believe additional methods beyond the floor integrity evaluation should be done. The railroad siding at that building may need study.
6. Tables 3, 4, and 5 in the work plan can also be found in the Quality Assurance Plan (Appendix B) as tables 4, 5, and 6. However, the tables do not exactly match in the proposed method of investigation column. These tables should be the same so as not to contradict one another.
7. Figure 1 needs to be revised to show the proper site location farther south along the railroad tracks.

Description of Current Conditions

8. This volume should be labeled as "Appendix A".
9. In Section 1.03.1, the last sentence in the first paragraph on page 1-4 does not make sense.
10. In Section 1.03.2, the groundwater velocity calculations need to be revised on pages 1-8 and 1-9. It is not necessary to divide by 7.5 when using hydraulic conductivity values in ft/sec. The groundwater velocity would then be 27 feet per year instead of 3.6 ft/yr.
11. In Section 1.03.2, the value used in groundwater velocity calculations for hydraulic gradient could be higher. Figures 5 and 7 showing groundwater contours have hydraulic gradients

between well MW-20 and MW-14 of 0.05 ft/ft. Using this higher number results in a possible groundwater velocity of 68 ft/yr. Groundwater velocity should be presented as a range.

12. In Section 1.03.2, on page 1-8, in the explanation of the velocity equation, "I" should equal gradient, not hydraulic conductivity.
13. In Section 4.02 for soils, the Pre-Investigation Evaluation of Corrective Measures Technology, low temperature thermal desorption could be used only if it did not involve a secondary combustion chamber (incineration) due to the existing Act 64 rule 299.9503(4)(a)(i). This rule is proposed for revision to allow this type of "incineration", and therefore the company should keep track of the status of this rule, and whether the Air Quality Division and the Waste Management Division can allow. Right now, I understand we could approve Low Temp thermal desorption if the volatiles were collected in a GAC or wet scrubber type of system.
14. In Section 4.03.2 for groundwater treatment, the recovery of non-aqueous phase liquids should be included. Removal of NAPL's is planned, but should be listed along with other groundwater treatment options.
15. In Table 2 through 12, the footnotes for MDNR Act 307 Type B should be "20x drinking water" for the soils Type B criteria. The reference should also include the citation "MERA Operational Memorandum #8, Revision 2".
16. For Table 2, another soil criteria option is available other than the Type B soil values. There is the Default Type A soil values found in MERA Operational Memo #15 which lists values for metals that are acceptable on a statewide basis in soils. Memo #15 values are higher than those found in Memo #8.
17. For Tables 6 through 12 on groundwater data, if the groundwater cleanup criteria is proposed to be the soils Type B number using Act 307 Rule 299.5709(4), the footnotes must state that, and justification must be provided in the text. Otherwise, the groundwater health based criteria should be used.
18. Figure 1 should be corrected to show the facility location farther south along the railroad tracks.
19. Figure 8 should show a depression in the clay surface at well MW-13 according to the data presented in Table 1.
20. For figures 11 through 15, it would be useful for spatial reference to also show monitor well locations.

RFI Quality Assurance Plan

21. This volume should be labeled as "Appendix B".
22. In Section 1.07, page 1-13, Tables 9, 10, and 11 are not the correct reference for SWMU investigations.
23. In Section 1.07, page 1-13, Figures 3, 4, and 5 do not show a regrouping of the SWMU's and Areas of Concern. Either the text or the figures need revision.
24. Section 2.02.1 should be revised to show that the WMD, MDNR will be responsible for RFI work plan approval since there will be a consent order signed with the State, not EPA.
25. Section 4.05.4(4) on well casing must be revised to have wells constructed of stainless steel casing, not PVC, due to the high concentration of organics in the groundwater. The majority of existing wells have stainless steel casings.
26. Section 4.05.10 should explain how soil and groundwater samples will be collected with the ECP.
27. Table 11 should list out the parameters included in EPA methods 8240 and 8270, or refer to another table that has the complete list.
28. Table 1 quantification limits will be reviewed by WMD using the detection limits listed in MERA Operational Memo #6, Revision 2 (February 22, 1993).
29. Tables 4, 5, and 6 should match the corresponding tables found in the Work Plan.

cc: De Montgomery, WMD

David Haydn



NATURAL RESOURCES COMMISSION

THOMAS J. ANDERSON
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John Engler, Governor
DEPARTMENT OF NATURAL RESOURCES

Compliance File

Delbert Rector, Director
SOUTHEAST MICHIGAN DISTRICT HEADQUARTERS
Waste Management Division
38980 Seven Mile Rd.
Livonia, Michigan 48152

September 3, 1991

Norm Taylor
Reichold chemical Inc.
601 Woodward Heights Boulevard
Ferndale, Michigan 48220

RE: MID 020087128

Dear Mr. Taylor,

On August 2, 1991, staff of the Michigan Department of Natural Resources (MDNR) conducted an inspection of your facility located at 601 Woodward Heights Boulevard Ferndale, Michigan, to evaluate compliance of that facility with the Michigan Hazardous Waste Management Act, Public Act 64 of 1979, as amended, MCL 299.501 et seq (Act 64), Michigan's Liquid Industrial Waste Hauling Act, Public Act 136 of 1969, as amended, (Act 136), and Subtitle C of the Federal Resource Conservation and Recovery Act of 1976, (RCRA), as amended, and any regulations promulgated pursuant to these Acts. Portions of the requirements that were reviewed are contained in the copy of the inspection reports enclosed.

As a result of the inspection, staff of the MDNR have determined that the above facility is in violation of the regulations. Specifically, staff found that the following requirement was not being met:

1. **Security.** Your facility has failed to prevent unknowing entry into the facility by leaving both gates open and not posting any security guard as required in 265.14(b)(1). I entered the facility on the of the inspection without being stopped or interrogated by your security. I searched for a while before I located a facility personnel to initiate my inspection. You are required to explain why the gates were left open and unmanned.

You must respond to this letter by September 20, 1991 providing documentation to this office regarding those actions being taken to correct the above stated violations. The MDNR will evaluate your response, determine your facility's compliance status, and notify you of this determination.



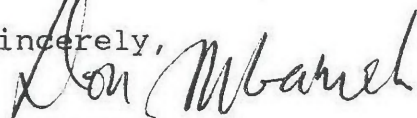
Page 2 of 2, September 3, 1991.
N. Taylor, MID 020087128

This Letter of Warning does not preclude nor limit the MDNR's ability to initiate any other enforcement action, under state or federal law, as deemed appropriate.

Enclosed, for your information, is a handout explaining the Pollution Incident Prevention Plan required for certain facilities in the State of Michigan under the Michigan Water Resources Commission, Public Act 245 of 1929, and a short informational sheet on waste minimization.

If you have any questions feel free to contact me.

Sincerely,



Donald Mbamah
Environmental Quality Analyst
Waste Management Division
Phone: 313-953-0241

DM/dm

Enclosures

cc: B. Okwumabua

U. S. EPA Region V, LB only

John Knaub - Reichold Chemical Inc.

800 Capitol Dr. Durham, NC 27713

RCRA LAND DISPOSAL RESTRICTIONS INSPECTION

I. General Information

Facility:

Reichold Chemical

U.S. EPA ID No.:

MD 020 087128

Street:

601 Woodward Heights Blvd

City:

ferndaleState: MZip: 48220

Telephone:

313 542 1037

Inspection Date:

8/2/91

Time:

11:30

(am/pm)

Weather Conditions:

Inspectors:

NameAgency/TitleTelephoneDon Mlamah MDNR/BA 313 953 0241

Facility Representatives:

Don Taylor Site Mgr

See Appendix B to determine which of the following LDR waste categories the facility manages:

	<u>Generate</u>	<u>Transport</u>	<u>Treat</u>	<u>Store</u>	<u>Dispose</u>
F001-F005 Solvents	_____	_____	_____	_____	_____
F020-F023 and F026-F028	_____	_____	_____	_____	_____
California List *	_____	_____	_____	_____	_____
First Third [40 CFR 268.10]	_____	_____	_____	_____	_____
Second Third [40 CFR 268.11]	_____	_____	_____	_____	_____
Third Third [40 CFR 268.12]	<input checked="" type="checkbox"/>	_____	_____	_____	_____

* See Appendix A

from clean up


INSPECTION SUMMARY

Processes That Generate LDR Wastes:

facility is being closed up,
all waste generated are as a
result of the clean up.

LDR Waste Management:

Summary: Most of the information was
gathered over the phone regarding clean up
waste. At the time of inspection, no detection
has been made regarding characteristics of the
waste.

Signature: 

RCRA LAND DISPOSAL RESTRICTION INSPECTION

IV. TSD REQUIREMENTS

A. Waste Analysis [40 CFR 268.7(b), 264.13, and 265.13]

1. Does the waste analysis plan address the following LDR waste categories?
[40 CFR 264.13(b)(6) and 265.13(b)(6)]

F001-F005 Spent Solvents	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
F020-F023 and F026-F028 Dioxins	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
California List Wastes	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
First, Second, and Third Third Wastes	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
Comments <u>clean up.</u>			

2. Has the waste analysis plan been revised to address F039 multi-source leachate?

Yes ☐ No ☐ NA ☐

cleaning

3. What date was the waste analysis plan last revised? / /

4. Does analytical data contain all the information required to treat, store, or dispose of restricted wastes? [40 CFR 264.13(a)(1) and 265.13(a)(1)]

Yes ☒ No ☐

If yes, which of the following are sources of analytical data? (More than one may apply.):

- ☒ Generator provides data
☐ Facility performs analyses in on-site laboratory
☒ Facility contracts analyses at off-site laboratory

Chemist, Cyanide

If the generator provides data, does the facility provide corroborative testing? [40 CFR 264.13(a)(2) and 265.13(a)(2)]

Yes ☐ No ☐ NA ☐

If analyses are conducted off site, identify lab:

Cyanide, Chemist etc

- a. Are wastes with treatment standards specified in 40 CFR 268.41 analyzed using the toxicity characteristic leaching procedure (TCLP)?* (BDAT** = stabilization/immobilization technology) [40 CFR 268.7(b)(1)]

Yes ☒ No ☐ NA ☐

*See Appendix C for exceptions.

**BDAT = best demonstrated available technology. See Appendix A.

If yes, list the wastes for which TCLP was used and provide the date of last test, frequency of testing, and note any problems. Attach test results. [40 CFR 264.73 (b)(3) and 265.73(b)(3)]

- b. Are wastes with treatment standards specified in 40 CFR 268.43 analyzed using total constituent analysis?* (BDAT = destruction/removal technology) [40 CFR 268.7(b)(3)]

Yes ☐ No ☐ NA ☐

*See Appendix C for exceptions.

If yes, list the wastes for which total constituent analysis was used and provide the date of last test, frequency of testing, and note any problems. Attach test results. [40 CFR 264.73 (b)(3) and 265.73(b)(3)]

- c. Is the paint filter liquids test (PFLT) used to determine if California List wastes are contained in liquid hazardous waste? [40 CFR 268.32(i)]

Yes ☐ No ☐ NA ☐

If yes, list the wastes for which PELT was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results. [40 CFR 264.73(b)(3) and 265.73(b)(3)]

B. Operating Record [40 CFR 264.73 and 265.73]

1. Does the operating record contain records and results of waste analyses performed as specified in 40 CFR 268.4 and/or 40 CFR 268.7(b)? [40 CFR 264.73(b)(3) and 265.73(b)(3)]

Yes ☒ No ☐

2. Does the operating record contain copies of LDR notifications and certifications?* [40 CFR 264.73(b)(11), (13), and (15) and 40 CFR 265.73(b)(11), (13), and (15)]

Yes ☒ No ☐

*Include both those received from generators, and those prepared for off-site shipments.

3. Does the operating record include appropriate documentation for restricted wastes which are managed wholly on site? [40 CFR 264.73(b)(12), (14), and (16) and 265.73(b)(12), (14), and (16)]

Yes ☒ No ☐ NA ☐

all records moved to lead office

Does the documentation discussed in points 2. and 3. reflect proper historical management of wastes previously covered under expired national capacity variances, case by case extensions, and the soft hammer provision?*

Yes ☒ No ☐ NA ☐

*Note that the soft hammer provision expired as of 05/08/90. Soft hammer wastes which had treatment standards established in the Third Third rule were granted a minimum 90-day national capacity variance to 08/08/90.

C. Storage [40 CFR 268.50]

1. Are prohibited* wastes stored on site in containers?

Yes ☐ No ☒ (If No, go to 2.)

*See Appendix E for distinction between restricted and prohibited wastes.

Are all containers clearly marked to identify the contents and date(s) entering storage? [40 CFR 268.50(a)(2)(i)]

Yes ☐ No ☐

Have wastes been stored for more than one year since the applicable LDR regulations went into effect?

Yes ☐ No ☐ (If No, go to 2.)

Can the facility show that such accumulation is necessary to facilitate property recovery, treatment, or disposal? [40 CFR 268.50 (c)]

Yes ☐ No ☐

If yes, state how: _____

2. Are prohibited wastes stored on site in tanks?

Yes ☐ No ☒ (If No, go to 3.)

Are all tanks clearly marked with a description of the contents, the quantity of each hazardous waste received, and date each period of accumulation begins, or is such information recorded and maintained in the operating record? [40 CFR 268.50(a)(2)(ii)]

Yes ☐ No ☐

Have tanks been emptied at least once per year since the applicable LDR regulations went into effect?

Yes ☐ No ☐ (If Yes, go to 3.)

Can the facility show that such accumulation is necessary to facilitate proper recovery, treatment, or disposal? [40 CFR 268.50(c)]

Yes ___ No ___

If yes, state how: _____

3. Does the facility store liquid hazardous waste containing PCBs at concentrations greater than or equal to 50 ppm?

Yes ___ No ___ (If No, go to D.)

all clean up waste

Does the facility meet the TSCA criteria in 40 CFR 761.65(b)? [40 CFR 268.50(f)]

Yes ___ No ___ *PCB waste shipped to Arkansas*

Have these wastes been stored for more than one year? [40 CFR 268.50(f)]

Yes ___ No ___

D. Treatment

1. Does the facility treat restricted wastes other than in surface impoundments?

Yes ___ No *NA* (If No, do not complete this section. Go to E.)

2. Are required technologies used to treat wastes which have treatment standards specified in 40 CFR 268.42? [40 CFR 268.40(b)]

Yes ___ No ___ NA ___ (If Yes or NA, go to 3.)

Was an alternative method approved?

Yes ___ No ___

List each waste code, the technology specified in 40 CFR 268.42, and the alternative method. Check if approval of the alternative method is documented. [40 CFR 268.42(b)]

<u>Waste Code</u>	<u>Required Technology</u>	<u>Alternative Method</u>	<u>Approval</u>
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

3. Lab packs: If alternative treatment standards are specified, are incinerator residues from lab packs containing D004, D005, D006, D007, D008, D010, and D011 treated in compliance with the subpart D treatment standards for these characteristic wastes? [40 CFR 268.42(c)(4)]

Yes ___ No ___ NA ___

4. Describe all other waste codes and treatment processes:

<u>Waste Code</u>	<u>Treatment Processes</u>
_____	_____
_____	_____
_____	_____

5. Characteristic wastes:

Is the 40 CFR Part 268 treatment standard lower than the 40 CFR Part 261 characteristic level?*

Yes ___ No ___

*This applies to both concentration based treatment standards specified in 40 CFR 268.41 and 268.43, and to some 40 CFR 268.42 required methods which result in treatment below the characteristic level. See Appendix D.

If yes, does the facility manage the waste as restricted until 40 CFR Part 268 treatment standards are met, even after the waste is rendered non-hazardous? [40 CFR 268.9(d)]

Yes ___ No ___

Comments _____

6. Dilution Prohibition [40 CFR 268.3]:

- a. Does the facility mix prohibited wastes with different treatment standards?

Yes ___ No ___ (If No, go to c.)

List the wastes _____

- b. Are the wastes amenable to the same type of treatment? [55 FR 22666]

Yes ___ No ___

If yes, is this method used for the aggregated wastes?

Yes ___ No ___

Comments _____

- c. Based on an assessment of points a. and b., or any other relevant information, is dilution used as a substitute for treatment? [40 CFR 268.3(a)]

Yes ___ No ___

Comments _____

7. Does the facility, in accordance with an acceptable waste analysis plan, test residues from all treatment processes? [40 CFR 268.7(b)]

Yes ___ No ___

Comments _____

8. Does the facility ship any characteristic wastes which have been rendered non-hazardous to a Subtitle D facility?

Yes ___ No ___ (If No, go to 9.)

Complete the following table:

<u>Waste Code</u>	<u>Receiving Facility</u>
_____	_____
_____	_____
_____	_____

Are a notification and a certification for each shipment sent to the Regional Administrator or authorized State? [40 CFR 268.9(d)(1) and 268.7(b)(5)]

Yes ___ No ___

9. Does the facility ship any wastes or treatment residues to an off-site land disposal facility?

Yes ___ No ___ (If No, go to 10.)

Complete the following table:

<u>Waste Code</u>	<u>Receiving Facility</u>
_____	_____
_____	_____
_____	_____

Are a notification and a certification provided to the land disposal facility with each waste shipment? [40 CFR 268.7(b)(4) and 40 CFR 268.7(b)(5)]

Yes ___ No ___

10. Does the facility ship any wastes or treatment residues to be further managed at a different treatment or storage facility?

Yes ___ No ___ (If No, go to E.)

Complete the following table:

<u>Waste Code</u>	<u>Receiving Facility</u>
_____	_____
_____	_____
_____	_____

Are appropriate generator notifications and certifications provided to the receiving facility with each waste shipment? [40 CFR 268.7(b)(6)]

Yes ___ No ___

E. **Surface Impoundments** [40 CFR 268.4] *MA*

1. Are restricted wastes placed in surface impoundments for treatment?

Yes ___ No ___ (If No, go to F.)

List _____

2. Are evaporation or dilution the only recognizable treatment occurring in the surface impoundment? [40 CFR 268.3(a) and 268.4(b)]

Yes ___ No ___

Comments _____

3. Has the facility submitted to the Agency a waste analysis plan and certification of compliance with minimum technology requirements and ground-water monitoring requirements? [40 CFR 268.4(a)(4)]

Yes ___ No ___

4. If the minimum technology requirements have not been met, has a waiver been granted for that unit? [40 CFR 268.4(a)(3)(ii)]

Yes ___ No ___ NA ___

5. Are representative samples of sludge and supernatant from the surface impoundment tested separately, acceptably, and in accordance with the sampling frequency and analyses specified in the waste analysis plan? (Attach test results.) [40 CFR 268.4(a)(2)(i)]

Yes ___ No ___

6. Does the operating record adequately document the results of waste analyses performed in accordance with 40 CFR 268.4? [40 CFR 264.73(b)(3) and 265.73(b)(3)]

Yes ___ No ___

Comments _____

7. Do the treatment residues (sludges or liquids) exceed applicable treatment standards/prohibition levels?

Sludge Yes ☐ No ☐ Waste Code _____
 Supernatant Yes ☐ No ☐ Waste Code _____

Provide the frequency of analyses conducted on treatment residues:

8. If sludge residues exceed treatment standards/prohibition levels, are they removed on an annual basis? [40 CFR 268.4(a)(2)(ii)]

Yes ☐ No ☐ NA ☐

Comments _____

Are residues subsequently managed in another surface impoundment? [40 CFR 268.4(a)(2)(iii)]

Yes ☐ No ☐

9. If supernatant is determined to exceed treatment standards, is annual throughput greater than impoundment volume? [40 CFR 268.4(a)(2)(ii)]

Yes ☐ No ☐ NA ☐

Comments _____

F. Land Disposal

1. Are restricted wastes placed in or on the land in units such as landfills, surface impoundments*, waste piles, land treatment units, salt domes/beds, mines/caves, concrete vaults, or bunkers? [40 CFR 268.2(c)]

Yes ☐ No ☐ (If No, go to G.)

*Note: Do not include surface impoundments addressed in E.

If yes, specify which units and what wastes each unit has received:

Unit	Waste
_____	_____
_____	_____
_____	_____

2. Does the facility, in accordance with an acceptable waste analysis plan, test prohibited wastes prior to land disposal to ensure that all applicable treatment standards and/or prohibition levels have been met? [40 CFR 268.7(c)(2)]

Yes ☐ No ☐

Comments _____

3. Does the facility test wastes to ensure that they do not exhibit any characteristics at the point of disposal?* [40 CFR 268.9(c)]

Yes ___ No ___ NA ___

*Note: A waste may exceed a characteristic level only if the treatment standard for that characteristic has been met.

4. Does the operating record adequately document the results of waste analyses performed in accordance with 40 CFR 268.7(c)? [40 CFR 264.73(b)(3) and 265.73(b)(3)]

Yes ___ No ___

If yes, at what frequency are analyses performed? _____

5. Does the facility land dispose of restricted wastes which are not prohibited?

Yes ___ No ___ (If No, go to 6.)

List waste codes in appropriate category below:

National Capacity Variance (40 CFR Part 268, Subpart C) _____

Case-By-Case Extension (40 CFR 268.5) _____

No-Migration Petition (40 CFR 268.6) _____

Treatment Standard Variance (40 CFR 268.44) _____

Does the operating record contain records of the quantities, date of placement, and a copy of the generator notification [40 CFR 268.7(a)(3)] for each shipment of restricted waste subject to a case-by-case extension or no-migration petition? [40 CFR 264.73(b)(10) and 265.73(b)(10)]

Yes ___ No ___ NA ___

Do land disposal units receiving wastes covered by a national capacity variance or case-by-case extension meet the requirements in 40 CFR 268.5(h)(2)?

Yes ___ No ___ NA ___

If the facility has a case-by-case extension, is progress being made as described in reports to the Regional Administrator?

Yes ___ No ___ NA ___

6. Are restricted wastes placed in underground injection wells?

Yes ___ No ___ List _____

G. Other Wastestreams

Clean up waste

1. Does the facility generate wastes other than residues from RCRA treatment units?

Yes ☒ No ☐ (If No, go to H.)

2. On-Site Management

- a. If characteristic wastes are treated in systems regulated under the Clean Water Act, have the following been documented: the determination of restriction, how restricted wastes are managed, and why wastes discharged pursuant to an NPDES permit are not prohibited (if applicable)? [55 FR 22662]

Yes ☐ No ☐ NA ☐

- b. If characteristic wastes are treated in RCRA exempt units to render them non-hazardous, are the wastes managed as restricted until 40 CFR Part 268 treatment standards are met?* [40 CFR 268.9(d)]

Yes ☐ No ☐ NA ☐

*This applies to both concentration based treatment standards specified in 40 CFR 268.41 and 268.43, and to some 40 CFR 268.42 required methods which result in treatment below the characteristic level. See Appendix D.

3. Off-Site Management: Waste Exceeds Treatment Standards

Are wastes that exceed treatment standards/prohibition levels (not subject to a national capacity variance) shipped to an off-site treatment or storage facility?

Yes ☒ No ☐ (If No, go to 4.)

Identify wastes code(s) and off-site treatment or storage facilities to which wastes are shipped.

Waste Code

Receiving Facility

001

Chem et

002

Chem et

Are LDR notifications provided for each shipment to the treatment or storage facility? [40 CFR 268.7(a)(1)]

Yes ☒ No ☐ (If No, go to 4.)

If alternative treatment standards are specified for lab packs, is the certification required in 40 CFR 268.7(a)(7) or (8) included with the notification?

Yes ☐ No ☐ NA ☒

4. Off-Site Management: Wastes Meets Treatment Standards

a. Are wastes that meet treatment standards/prohibition levels shipped to an off-site disposal facility?

Yes ☒ No ☐ (If No, go to 5.)

NA Identify waste code(s) and off-site disposal facilities:

<u>Waste Code</u>	<u>Receiving Facility</u>
<u>60</u>	<u></u>
<u></u>	<u></u>
<u></u>	<u></u>

Are LDR notifications and certifications provided for each shipment to the disposal facility? [40 CFR 268.7(a)(2)(i) and 268.7(a)(2)(ii)]?

Yes ☐ No ☐ (If No, go to b.)

b. Are characteristic wastes which have been rendered non-hazardous (in a RCRA exempt unit) shipped to a Subtitle D facility?

Yes ☐ No ☐ NA ☒ (If No or NA, go to 5.)

Complete the following table:

<u>Waste Code</u>	<u>Receiving Facility</u>
<u></u>	<u></u>
<u></u>	<u></u>
<u></u>	<u></u>

Are a notification and a certification for each shipment sent to the Regional Administrator or authorized State? [40 CFR 268.9(d)(1) and 268.7(b)(5)]?

Yes ☐ No ☐

5. **Off-Site Management: Wastes Subject to Variances, Extensions, or Petitions**

- a. Are wastes that are subject to a national capacity variance (40 CFR Part 268, Subpart C) or a case-by-case extension (40 CFR 268.5) shipped to a treatment, storage, or disposal facility?

Yes _____ No Y (If No, go to 6.)

Complete the following table:

<u>Waste Code</u>	<u>Receiving Facility</u>

- b. Are LDR notifications (stating that the waste is not prohibited from land disposal) provided for each shipment to the off-site receiving facility? [40 CFR 268.7(a)(3)]

Yes _____ No _____

6. **Dilution Prohibition [40 CFR 268.3]:**

- a. Are prohibited* wastes with different treatment standards mixed?

*See Appendix E for distinction between restricted and prohibited wastes.

Yes _____ No ✓ (If No, go to b.)

List the wastes

Are the wastes amenable to the same type of treatment? [55 FR 22666]

Yes _____ No _____

Comments

- b. Are prohibited wastes diluted to meet treatment standard criteria, or render them non-hazardous? [55 FR 22665-22666]

Yes No / (If No, go to c.)

Check appropriate category:

Dilutes to meet treatment standards

Dilutes to render waste non-hazardous

Do wastes fall into the following categories? (Check if appropriate.) [40 CFR 268.3(b)]

- ☐ Managed in treatment systems regulated under the Clean Water Act
☐ Non-toxic* characteristic wastes
☐ Treatment standard specified in 40 CFR 268.41 or 268.43

*Non-toxic = D001 (except high TOC nonwastewaters), D002, and D003 (except cyanides and sulfides). [55 FR 22666]

If the wastes do not fall into the above categories, briefly describe the conditions under which they were diluted.

- c. Based on an assessment of points a. and b., and any other relevant circumstances, are prohibited wastes diluted as a substitute for adequate treatment? [40 CFR 268.3(a)]

Yes ☐ No ☒

Comments

H. Additional Comments, Concerns, or Issues Not Addressed in the Checklist:

The facility is being cleaned up by the engineering firm of O'Brien & Gere, in conjunction with O'Han. All waste resulted from this clean up.

DEPARTMENT OF NATURAL RESOURCES
WASTE MANAGEMENT DIVISION

STAFF REPORT

DAY	S	M	T	W	TH	F	S
				X			

- ☐ Complaint Inspection
☐ Compliance Inspection
☐ Construction/Closure Inspection
☐ Permitting Inspection
☐ PEAS Investigation

- ☐ PCB Report/Complaint
☐ Sampling Inspection
☐ Telephone Call
☐ Meeting Notes
☐ Other _____

WEATHER

TEMP

WIND

HUMIDITY

Brite Sun	Clear	Overcast	Rain	Snow
To 32	32-50	50-70	70-85	85 up
Still	Moder.	High	Report No.	
Dry	Moder.	Humid.		

☐ Act 64 _____
☐ Act 136 _____

☐ Act 641 _____
☐ HSWA _____

☐ Act 245 _____
☐ RCRA _____

DATE 5-30-90 TIME

COMPANY/FACILITY Reichhold Chemicals FACILITY NO. MID 000 089 128

ADDRESS/LOCATION Ferndale, MI STAFF D. Slayton, S. Blayton

PARTICIPANTS O'Brien + Gee, OHM, Reichhold, City of Ferndale, Local Citizens (see attached list)

- Meeting at site, site tour
- Mtg opened by John Kraub of Reichhold - Site Mgr. for cleanup
O'Brien + Gee: Engineers OH Materials: contractors
(Don Stone: Mgr.)

- Decontamination, Decommission, Limited Demolition
- ① Cleaning - removing all waste + chemicals by August 1990
[= \$2,000,000 in next 3 months or so]

- O+G (Don Stone): Decon, evaluate - just starting
- ① Decontam bldg, piping, sewers, tanks
- ② limited asbestos removal w/ demolition → south yard tank farm Bldg 103

- OH Materials (Mark Lockart): 3rd Reichhold job. Strictly an environmental firm, experienced.

- ① In Phase 1 - "decommissioning" - cleaning surfaces, walls, pipes, bldgs, etc. about 1 month to complete. Dave Lockart → 4 levels of effort (divided up site east-hand). Started in South part. Using high pressure water (3,000-19000 PSI). South tank farm will be removed. Also working in West area now. Testing drums for disposal, staging. Collecting with water-vac truck. Will be setting up WWTP on site once Detroit tells them what limits are. Storing water for now in tank.

SIGNED

D.S.

DEPARTMENT OF NATURAL RESOURCES
WASTE MANAGEMENT DIVISION

STAFF REPORT

DAY	S	M	T	W	TH	F	S

- ☐ Complaint Inspection
☐ Compliance Inspection
☐ Construction/Closure Inspection
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- ☐ PCB Report/Complaint
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☐ Meeting Notes
☐ Other _____

WEATHER

TEMP

WIND

HUMIDITY

Brite Sun	Clear	Overcast	Rain	Snow
To 32	32-50	50-70	70-85	85 up
Still	Moder.	High	Report No.	
Dry	Moder.	Humid.		

- ☐ Act 64 _____ ☐ Act 641 _____ ☐ Act 245 _____
☐ Act 136 _____ ☐ HSWA _____ ☐ RCRA _____

DATE	TIME
5-30-90	

COMPANY/FACILITY <i>Reichhold Chemical</i>	FACILITY NO.
ADDRESS/LOCATION <i>Ferndale, MI</i>	STAFF <i>Slayton, Bligen</i>
PARTICIPANTS <i>(see attached list)</i>	

Fred Halverson (Health + Safety) OHA : daily safety meetings, all workers trained. Fairly "low hazard" project (direct contact from residual product. Have written safety plan based on OSHA, CFR. Are doing air monitoring (found nothing so far). Have not found many chemicals yet, plant fairly well cleaned out. Anticipate no problems, done many times (plant decommissioning). Adano is subcontractor for asbestos during phase I. Most asbestos removal w. ll be in next phase (Phase II). RFI work basically on hold during plant decommissioning.

Started site tour 1:45 pm. Started at South Area

Doing asbestos removal at tanks. Warehouse empty.

West Area : ^{high} pressure wash going on on bldg "D", walked around southern part of this area. Observed drum staging area

East Area : Walked around area, observed huge waste storage area, nearly full of drums, neat. Observed end of pipe tunnel under tracks, had water (pipe break in winter, and some ~~at~~ groundwater)

Met again in conf. room (2:45). Discussed notification, reports will be sent, copies of contract documents, gas + elect. mostly shut off.

discussed question

SIGNED

David Slayton

PLEASE SIGN IN

NAME

REPRESENTING

MAILING ADDRESS

David Layton	MONR	P.O. BOX 30241, Lansing, MI 48909
Steve Blayev	MDNR	P.O. Box 30241, Lansing, MI 48909
LAWRENCE RUMONIZ	FERN-RIDGE	741 W. CAMBOURNE, FERNDALE MI, 48226
Fred Halvonen	OHM	
Matt Rupp	OBIG	
Dave Lockert	OHM	
Rene Valera	DWSD	
KETAN DESAI	DWSD	
BOB WALDICK	COUNCILMAN FERNDALE	
Brian M. Smith	City Attorney Ferndale	1133 E. Maple Troy, MI 48063
GARY LOHMEIER	FIRE CHIEF	1635 LIVERNOIS - FERNDALE
ESS R. SOLTESS	CITY MANAGER	300 E. 9 MILE "
BILL LEGAULT	FIRE MARSHAL	1635 LIVERNOIS
Janet Norich	Fern/Ridge Coalition	706 Pinecrest, Fern.
John Knaul	R.C.I.	
MARK LASKIN	OHM	
Donald Storr	Chief of Gene Engineers.	
Eric T. Log	City of Ferndale	
Donald Mbama	MDNR	
NORMAN TAYLOR	R.C.I. DIST	707 WOODWARD HT-FERD. MI.

SCOTT ADAMASKI
(Now office of
OBrien & Gere)

347-4350

MID 820 087 128

EPA Reporting

PAGE ____ OF ____

DEPARTMENT OF NATURAL RESOURCES
WASTE MANAGEMENT DIVISION

STAFF REPORT

DAY	S	M	T	W	TH	F	S

- ☐ Complaint Inspection
☐ Compliance Inspection
☒ Construction/Closure Inspection
☐ Permitting Inspection
☐ PEAS Investigation

- ☐ PCB Report/Complaint
☐ Sampling Inspection
☐ Telephone Call
☐ Meeting Notes
☐ Other _____

WEATHER

TEMP

WIND

HUMIDITY

Brite Sun	Clear	Overcast	Rain	Snow
To 32	32-50	50-70	70-85	85 up
Still	Moder.	High	Report No.	
Dry	Moder.	Humid.		

- ☒ Act 64 _____
☐ Act 136 _____
☐ Act 641 _____
☐ HSWA _____
☐ Act 245 _____
☒ RCRA _____

DATE 9-18-89 TIME

COMPANY/FACILITY	Reichhold Chemicals	FACILITY NO.	MID 020 087 128
ADDRESS/LOCATION	Ferndale, MI	STAFF	Slayton, Blyer
PARTICIPANTS	Mike Kowalski (Reichhold), Sue Titusken (IT Corp)		Buda, Buda,
	- meeting started ~1:00 pm at Reichhold Chemicals.		D. Mbamali, all from WMD
			ERD (Cheryl Wallace)
	<p>- Mike + Sue discussed activities underway. Plant is closed except for some warehouse operations. They are looking into asbestos removal if needed, one 19,000 gallon gasoline tank has been removed. The soil-gas survey is underway (plant-wide), The drill rig is supposed to arrive today for the first phase monitor well installation.</p>		
	<p>- We then toured the entire plant, starting with the "east" section where the two ^{ACT 64} RCRA storage units are (drum storage, tanks). Concrete in these areas was newer than the rest of the plant. Drum storage still in use as company is cleaning out labs, etc, and is using lab-packs (drums). Much of the concrete (walls, sec. containment) in the plant is old and in poor shape. Many unloading/transfer areas have questionable containment (these are product). Observed IT Corp doing the soil-gas survey using a Photo-Vac TIP meter. Photographs were taken by DNR.</p>		

~2:30 - left for meeting w/ City of Ferndale, City of Pleasant Ridge, etc

SIGNED

D. Slayton

Distribution: Original - District/Lansing CTE File.
 1st copy - Lansing File/District Detroit
 2nd copy - Inspector

STATE OF MICHIGAN



NATURAL RESOURCES COMMISSION
THOMAS J. ANDERSON
MARLENE J. FLUHARTY
GORDON E. GUYER
KERRY KAMMER
O. STEWART MYERS
DAVID D. OLSON
RAYMOND POUPORE

JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

S.E. MICHIGAN FIELD OFFICE
Waste Management Division
505 W. Main
Northville, MI 48167

September 11, 1989

Norm Taylor
Reichold Chemical, Inc.
601 Woodward Heights Blvd
Ferndale, Michigan 48220

LB=0

RE: MID 020087128

Dear Mr. Taylor,

On September 8, 1989, an inspection was conducted at your facility located at 601 Woodward Heights Blvd. Ferndale Michigan. The purpose of the inspection was to evaluate compliance of that facility with the requirements of Subtitle C of the Resource Conservation and Recovery Act (RCRA) of 1976, as amended; Michigan's Hazardous Waste Management Act, Act 64 of 1979, as amended; Michigan's Liquid Industrial Waste Hauling Act, Act 136, P.A. 1969, as amended; and Land Disposal Restriction requirements of Subtitle C of the Resource Conservation and Recovery Act (RCRA) of 1976, as amended.

As a result of that inspection, it has been determined that your facility is in violation of the following requirements:

1. Drums no label. 9 drum of hazardous waste were not marked with storage date and hazardous waste number or with the words "Hazardous Waste" as required under Rule 306(1).
2. Leaks from drums and buckets. Drums and buckets were not managed to prevent leaks as required under Rule 306(1)(a) and 40 CFR 265.173(b).
3. Training record. The training records did not have job title and job description as required under 265.16(1)(2).
4. Annual review. Personnel training did not indicate that personnel have taken part in annual review as required under -264.16(c).
5. Evidence of release. There was evidence of release of hazardous waste or hazardous waste constituents in the storage area contrary to the requirements of 265.31.

Norm Taylor
September 11, 1989
page 2

6. Isle space. There was not adequate isle space in the storage area as required under 265.35.
7. Emergency coordinator. The contingency plan has not been amended to reflect changes in facility's list of emergency coordinators as required under 265.54.
8. Biennial report. The owner and operator has not submitted a biennial report to the required administration as required under 265.75.
9. Stored closed. 9 containers (Drums and Buckets) were not stored closed as required under Rule 306(1)(a) and 40 CFR 265.173(a).
10. Inspection of storage area. The containers are not inspected weekly as required under Rule 306(1)(a) and 40 CFR 265.174. In fact the last inspection was in June.

We request your response by October 15, 1989 documenting your corrective actions to these violations.

If you have any questions, please contact me at (313) 344-4670.

Sincerely



Donald Mbamah
Environmental Quality Analyst

DM/dm
cc: B. Okwumabua
U.S. EPA (Region V)

RCRA/ACT 64 INSPECTION REPORT

U.S. EPA I.D. Number M 1 D 0 2 0 0 8 7 1 2 8
(or Michigan)FACILITY NAME REICHOOLD CHEMICAL, INC
(Mailing Address) 601 Woodward ~~St~~ Hgts Blvd
Fern dale MICHIGAN 48220
CITY ZIP CODEDATE 9/8/89 TIME OF INSPECTION (FROM) 10:30 (TO) 1:30PERSON(S) INTERVIEWED John Yonke TITLE Engineer TELEPHONE (313) 842 0270INSPECTOR(S) DONALD MBAMAH AGENCY/TITLE MDNR/EOA TELEPHONE (813) 344 4670Primary Business of this Facility: Manufactured Synthetic
resins (Applied for closure)

Reason for Inspection:

☒ Routine ☐ Follow-up ☐ Complaint

Based upon the inspection, this facility:

- ☐ is a non-generator/liquid industrial waste generator
☐ conditionally exempt small quantity generator
☐ small quantity generator
☒ generator
☐ transporter
☒ treatment/storage/disposal facility

FORM

A
A
A
B
C
DDate of Last Inspection 9/4/80

INSPECTION FORM D

Part 6 of Rules

P.A. 64 of 1979

TREATMENT, STORAGE, DISPOSAL FACILITY

This Facility:

- ☒ Generates Hazardous Waste (Also use Generator Appendix)
- ☐ Treats Hazardous Waste
- ☒ Stores Hazardous Waste
- ☐ Disposes of Hazardous Waste
- ☐ Transports Hazardous Waste (Also use Form C)

This Facility:

- ☐ Accepts wastes from off-site sources
- ☒ Handles only its own wastes

If applicable, hazardous waste is stored in the following:

- ☒ Drums (Containers)
- ☒ Above-ground tanks
- ☐ Underground tanks
- ☐ Waste piles
- ☐ Lagoons
- ☐ Other
- ☐ Not applicable

If applicable, hazardous wastes are treated/disposed in the following:
(Attach appropriate checklist)

- ☐ Surface Impoundments
- ☐ Waste piles
- ☐ Land Treatment
- ☐ Landfills
- ☐ Incineration/Thermal Treatment
- ☐ Chemical, Physical and Biological Treatment
- ☐ Above-ground tanks

INSPECTION D

____ Underground tanks

____ Drums

____ Other

____ Not applicable

WASTE STREAMS

Hazardous Waste Code/Name	Source	Type of Storage	How Much
D001		Drum/Tank	
F003 spent solvent	cleaning	Drum	
D002 paint	Air Control Equip	Drum	

INSPECTION FORM D
Part 6 Rules
P.A. 64 of 1979

HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITY
Applies to Those Facilities That Do Not Have an Act 64 Permit

General Facility Standards
Rule 601, 40 CFR 265, Subpart B

<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Violation</u> <u>Class</u>
------------	-----------	------------	----------------------------------

1. If required, have the following been notified:

a.) Notified Director of receipt of hazardous waste from a foreign source? 265.12(a)

—	—	✓	II
---	---	---	----

b.) Notified Director of change of owner or operator.
40 CFR Part 270. 265.12(b)

—	—	✓	II
---	---	---	----

Comments: _____

2. General Waste Analysis: 265.13

a.) Has the owner or operator obtained a detailed chemical and physical analysis of the waste? 265.13(a)

✓	—	—	I
---	---	---	---

b.) Does the owner or operator have a detailed waste analysis plan on file at the facility? 265.13(b)

✓	—	—	I
---	---	---	---

c.) Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site? 265.13(c)

—	—	✓	I
---	---	---	---

Comments: _____

INSPECTION FORM D

Yes	No	N/A	Violation Class
-----	----	-----	-----------------

3. Security - If applicable, do security measures include:

- | | | | | |
|---|-------------------------------------|--------------------------|--------------------------|---|
| a.) 24-hour surveillance? 265.14(b)(1) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | I |
| or | | | | I |
| b.) i. Artificial or natural barrier around facility? 265.14(b)(2)(i) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| and | | | | |
| ii. Controlled entry? 265.14(b)(2)(ii) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | I |
| c.) Danger signs (s) at entrance? 265.14(c) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | I |

Comments: _____

4. Owner or operator inspections: 265.15*

- | | | | | |
|--|-------------------------------------|--------------------------|--------------------------|----|
| a.) Does the owner or operator inspect the facility for malfunctions, deterioration, operator errors, and discharges of hazardous waste that may affect human health or the environment? 265.15(a) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | II |
| b.) Does the owner or operator have a written inspection schedule at the facility? 265.15(b)(1) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | II |
| c.) If so, does the schedule address the inspection of the following items: | | | | |
| i. Monitoring equipment? 265.15(b)(1) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | II |
| ii. Safety and emergency equipment? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | II |
| iii. Security devices? 265.15(b)(1) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | II |
| iv. Operating and structural equipment (i.e. dikes, pumps, etc.)? 265.15(b)(1) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | II |

* These violations are Class II, unless observations of hazardous conditions or violations are noted in the log and not corrected which result in the release or actual harm to the environment or human health; in such instances violations are Class I.

INSPECTION FORM D

Yes	No	N/A	Violation Class
-----	----	-----	-----------------

v. Type of problems to be looked for during the inspection (e.g. leaky fitting, defective pump, etc.)? / — — II

vi. inspection frequency (based upon the possible deterioration rate of the equipment)? 265.15(b)(4) / — — II

d.) Are areas subject to spills inspected daily when in use? 265.15(b)(4) / — — II

e.) Does the owner or operator maintain an inspection log or summary of owner or operator inspections? / — — II

f.) Does the inspection log contain the following information: 265.15(d)

i. The date and time of the inspection? 265.15(d) / — — II

ii. The name of the inspector? 265.15(d) / — — II

iii. A notation of the observations made? 265.15(d) / — — II

iv. The date and nature of any repairs or remedial actions? 265.15(d) / — — II

Comments: Last day inspection was done - 6/15/89

5. Do personnel training records include: 265.16

a.) Job titles? 265.16(d)(1) — / — I

b.) Job descriptions? 265(d)(2) — / — I

c.) Description of training? 265.16(d)(3) / — — I

INSPECTION FORM D

Violation
Class

Yes

No

N/A

- d.) Records of training?
265.16(d)(4)

II

- e.) Do new personnel receive re-
quired training within six
months? 265.16(d)

I

- f.) Do personnel training records
indicate ~~that personnel~~ have
taken part in an annual review
of training? 264.16(c)

I

Comments:

No annual Since 1987

6. If required, are the following special
requirements for ignitable, reactive, or
incompatible wastes addresses?
265.17

I

- a.) Special handling? 265.17(a)

I

- b.) No smoking signs? 265.17(a)

I

- c.) Separation and protection from
ignition sources? 265.17(a)

I

Comments:

PREPAREDNESS AND PREVENTION
Rule 606, 40 CFR 265, Subpart C

1. Is there any evidence of fire, explosion,
or release of hazardous waste or hazard-
ous waste constituents 40 CFR Rule 265.31

I

Comments:

The Storage area looked messy
with liquid substance suspected to be
leaking from drums.

INSPECTION FORM D

Yes	No	N/A	Violation Class
-----	----	-----	-----------------

2. If required, does this facility have the following equipment: 40 CFR 265.32 2-way radio

a.) Internal communications or alarm systems. 40 CFR 265.32(a)

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	I
-------------------------------------	--------------------------	--------------------------	---

b.) Telephone or 2-way radios at the scene of operations. 40 CFR 265.32(b)

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	I
-------------------------------------	--------------------------	--------------------------	---

~~c.)~~ Portable fire extinguishers, fire control, spill control equipment and decontamination equipment. 40 CFR 265.32(c)

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	I
-------------------------------------	--------------------------	--------------------------	---

d.) Indicate the volume of water and/or foam available for fire control.

City water

Comments: Westside has been cleared of all

Combustibles and water will be

cut off due to lack of
heat (∴ electric supply/gas)

3. Testing and Maintenance of Emergency Equipment: 265.33

a.) Has the owner or operator established testing and maintenance procedures for emergency equipment? 265.33

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
-------------------------------------	--------------------------	--------------------------	--

b.) Is emergency equipment maintained in operable condition? 265.33

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
-------------------------------------	--------------------------	--------------------------	--

c.) If required, has owner or operator provided immediate access to internal alarms? 40CFR 265.34(a)

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
-------------------------------------	--------------------------	--------------------------	--

d.) Is there adequate aisle space for unobstructed movement for personnel and emergency equipment. 40 CFR 265.35.

<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	I
-------------------------------------	-------------------------------------	--------------------------	---

— Bucket & Drums are stored without organisation — Not all the drum/Bucket were accessible

INSPECTION FORM D

Yes	No	N/A	Violation Class
-----	----	-----	-----------------

Comments: _____

4. Has the owner or operator attempted to make arrangements with local authorities in case of emergencies. 40 CFR 265.37

II

Comments: _____

CONTINGENCY PLAN AND EMERGENCY PROCEDURES

Rule 607, 40 CFR 265 Subpart D.

1. Does the contingency plan contain the following information:

- a.) The actions facility personnel must take to comply with 265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention Control and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (As applicable). 265.52(a)

I

- b.) Arrangements or attempts to make arrangements agreed to by local police departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services, pursuant to 40 CFR 265.52(c) 265.37

II

- c.) Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinator. 40 CFR 265.52(d)

Due to lay offs & change in duties, changes have not been duly recorded

INSPECTION FORM D

Violation

Yes	No	N/A	Class
-----	----	-----	-------

d.) A list of all emergency equipment at the facility which includes the location and physical description of each item on the list, and a brief outline of its capabilities. 40 CFR 265.52(e)

II

e.) An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes and alternate evacuation routes.) 40 CFR 265.52(f)

II

f.) Is the facility emergency coordinator identified. 40 CFR 265.55

II

g.) Is coordinator familiar with all aspects of site operation and emergency procedures. 40 CFR 265.55

II

h.) Does the Emergency Coordinator have the authority to carry out the Contingency Plan. 40 CFR 265.55

II

i.) If an emergency situation has occurred at this facility, has the emergency coordinator followed the emergency procedures listed in 265.56.

I

j.) Has contingency plan been amended to reflect changes in regulations, plan failure, changes in the facility, list of emergency coordinators, changes in emergency equipment. 40 CFR 265.54

II

Comments:

INSPECTION FORM D

	Yes	No	N/A	Violation Class
2. Are copies of the contingency plan available at site and local emergency organizations. 40 CFR 265.53(a) 264.53(b)				II

Comments: _____

USE OF MANIFEST SYSTEM

Rule 601(2)(b)

1. Does this facility receive hazardous waste accompanied by a manifest. If yes, complete the following:

N/A

a.) Are copies signed and dated.

I

Rule 608(1)(a)

b.) Are significant discrepancies noted on the manifest.

I

Rule 608(1)(b)

c.) Are transporters given 1 copy of the signed manifest.

I

Rule 608(1)(c)

d.) Are copies sent to the generator within 30 days. Rule 608(1)(d)

I

e.) Are copies of the manifest retained for 3 years.

I

f.) Are copies of the manifest returned to DNR within 10 days after end of month. Rule 608 (1)(f)

II

Comments: _____

INSPECTION FORM D

<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Violation</u> <u>Class</u>
------------	-----------	------------	----------------------------------

2. Does this facility ship hazardous waste off-site. If yes, complete Generator Appendix.
Rule 608(3)

<u> / </u>	<u> </u>	<u> </u>	<u> N/A </u>
--------------	-------------	-------------	----------------

Comments: _____

3. For unreconciled significant discrepancies in manifests has the Director been notified. Rule 608(4)

<u> </u>	<u> </u>	<u> / </u>	<u> I </u>
-------------	-------------	--------------	--------------

Comments: _____

_____RECORDKEEPING

Rule 601(3) 40 CFR 265. Subpart E

1. Does the owner or operator of this facility maintain an operating record? Rule 609(1)

<u> / </u>	<u> </u>	<u> </u>	<u> II </u>
--------------	-------------	-------------	---------------

Comments: _____

2. Does this operating record contain:
265.73

- a.) The method(s) and date(s) of each waste's treatment, storage, or disposal as required in 40 CFR Part 265.73(b)(1) Appendix E

<u> / </u>	<u> </u>	<u> </u>	<u> II </u>
--------------	-------------	-------------	---------------

INSPECTION FORM D

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Violation</u> <u>Class</u>
b.) The location and quantity of each hazardous waste within the facility? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.) 265.73(b)(2)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	II
c.) If this facility disposes of hazardous waste on-site, is there a map or diagram of disposal area. 265.73(b)(2)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	II
d.) Records and results of all waste analyses, trial tests, monitoring data, and operator inspections? 265.73(b)(3)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	II
e.) Reports detailing all incidents that required implementation of the Contingency Plan? 265.73(b)(4)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	II
f.) Records and results of inspections as required in 40 CFR 264.15(d) 265.73(b)(5)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	II
g.) <u>If required</u> , monitoring, testing, or analytical when required by construction permit or operating license. Rule 265.73(b)(6)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	II
h.) Closure and post closure cost estimates. 265.73(b)(7)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	II

Comments: _____

3. Are all required records available and maintained for at least 3 years. 265.74(3)

☒ ☐ ☐ ☐ II

INSPECTION FORM D

Yes	No	N/A	Violation Class
-----	----	-----	-----------------

Comments: _____

REPORTING

1. Has the owner or operator submitted a biennial report to the required administration by March 1 of even numbered years? 265.75

II

Comments: _____

2. If applicable, for TSD's that receive hazardous waste from off-site sources. Rule 265.76

I

- a.) Has the facility accepted any hazardous waste from an off-site generator subject to Rule 205 without a manifest or shipping paper?

I

- b.) If "a" is yes, provide the identity of the source of the waste and a description of the quantity, type, and date received for each unmanifested hazardous waste shipment.

I

USE AND MANAGEMENT OF CONTAINERS
Drums/Roll-off Boxes/Gondolas

1. Is hazardous waste accumulated in containers? If no, skip to tank section.

N/A

2. a.) Is each container clearly marked with accumulation date and hazardous waste number Rule 306(1)(c)? If no, how many

I

INSPECTION FORM D

	Yes	No	N/A	Violation Class
b.) Has more than 90 days elapsed since date marked (Operating license needed as required in Part 5 of Rules) If yes, how many drums _____ Accumulation dates _____				I
c.) Is each container labeled or marked clearly with the words "Hazardous Waste" rule 306(c) If no, how many _____				I
d.) Are containers in good condition Rule 306(l)(a), 40 CFR 265.171. If no, specifically, what is their conditions _____				I
e.) Are containers compatible with waste in them. RULE 306(l)(a) 40 CFR 265.172. If no, explain _____				I
f.) Are containers stored closed, Rule 306(l)(a), 40 CFR 265.173(a) If no, how many _____				I
g.) Are containers managed to prevent leaks? Rule 306(l)(a), 40 CFR 265.173(b) If no, explain _____				I
h.) Are containers inspected weekly for leaks and defects? Rule 306(l)(a) 40 CFR 265.174.				I
i.) Are ignitable and reactive wastes stored at least 15 meters (50 Feet) from property line? (Indicate if waste is ignitable or reactive) Rule 306(l)(a) 40 CFR 265.176. If no, explain _____				I
j.) Are incompatible wastes stored in separate containers (If not the provisions of 40 CFR 265.17(b) apply) Rule 306(l)(a) 40 CFR 265.176. If no, explain _____				I

INSPECTION FORM D

Yes	No	N/A	Violation Class
-----	----	-----	--------------------

- k.) Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance? Rule 306(1)(a) 40 CFR 265.177.

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	I
-------------------------------------	--------------------------	--------------------------	---

Comments: _____

3. If storing free liquid, does hazardous waste storage area include: rule 306(1)(a) 40 CFR 264.175.

- a.) Impervious base free of cracks. 40 CFR 264.175(b)(1)

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	I
-------------------------------------	--------------------------	--------------------------	---

- b.) Containment capable of holding 10% of volume of containers or 10% of largest container whichever is greater.

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	I
-------------------------------------	--------------------------	--------------------------	---

Comments: _____

4. Is hazardous waste being accumulated at the point of generation, Rule 306(2)

<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	N/A
--------------------------	-------------------------------------	--------------------------	-----

If yes:

- a.) Is container less than 55 gallons or one quart of acutely hazardous waste? Rule 306(2)
- b.) Is container under control or operator and near point of generation and under control of operator? Rule 306(2)
- c.) Are containers in good condition? Rule 306(2) 40 CFR 265.171

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	I
--------------------------	--------------------------	--------------------------	---

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	I
--------------------------	--------------------------	--------------------------	---

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	I
--------------------------	--------------------------	--------------------------	---

INSPECTION FORM D
Violation
Class

	Yes	No	N/A	Class
d.) Are containers compatible with waste in them? Rule 306(2) 40 CFR 265.172	—	—	—	I
e.) Are containers stored closed when not in use and managed to prevent leaks? Rule 306(2) 40 CFR 265.173	—	—	—	I
f.) Are containers marked with the words "Hazardous Waste" and waste number (or other words that identify the contents) Rule 306(2)	—	—	—	I

Comments: _____

TANKS

1. Is hazardous waste accumulated in tanks? If no, skip to c.	✓	—	—	N/A
a.) Is each tank labeled or marked with the words "Hazardous Waste", Rule 306(1)(a), 40 CFR 252.34(a)	✓	—	—	I
b.) Are tanks used to store only those wastes which will not cause corrosion, leaking or premature failure of the tank? Rule 306(1)(a), 40 CFR 262.192(b).	✓	—	—	I
c.) Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structure. Rule 306(1)(a), 40 CFR 265.192(c)?	—	—	✓	I
d.) Do continuous feed systems have a wastefeed cutoff? Rule 306(1)(a), 40 CFR 265.192(d).	✓	—	—	I
e.) Are required daily and weekly inspections done? Rule 306(1)(a), 40 CFR 265.194?	✓	—	—	II

INSPECTION FORM D

Yes	No	N/A	Violation Class
-----	----	-----	-----------------

f.) Are reactive and ignitable wastes in tanks protected or rendered non-active or non-ignitable? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements. 261.21 or 261.23 Rule 306(1)(a), 40 CFR 265.199

✓			II
---	--	--	----

g.) Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR 265.17(b) apply.) Rule 306(1)(a), 40 CFR 265.199.

✓			I
---	--	--	---

h.) Has the owner or operator observed the National Fire Protection Association's buffer zone requirements for tanks containing ignitable or reactive wastes? Rule 306(1)(a) 40 CFR 198 (3)(b)

✓			I
---	--	--	---

Tank capacity: 5500 gallons

Tank diameter: _____ feet

Distance of tank from property line _____ feet.

(See tables 2-1 through 206 of NFPA's "Flammable and Combustible Liquids Code - 1977" to determine compliance.)

Comments: _____

2. Do above ground tanks have a 150% containment area constructed of impervious material, or if tanks hold incompatible wastes is each tank structurally enclosed? Rule 615(3)

	✓		I
--	---	--	---

INSPECTION FORM D

Yes	No	N/A	Violation Class
-----	----	-----	--------------------

Comments: _____

3. Do owners and operators of underground tanks do all the following:

- | | | | | |
|--|-------|-------|-----------|---|
| a.) Provide secondary adequate containment and leachate collection system. Rule 615(4)(a) | _____ | _____ | ____/____ | I |
| b.) Conduct an inventory of the contents of the tanks at least twice a month. rule 615(4)(b) | _____ | _____ | _____ | I |
| c.) Conduct leachate sampling at least once a year. Rule 615(4)(c) | _____ | _____ | _____ | I |
| d.) Maintain an accurate inventory of the tank. Rule 615(4)(d) | _____ | _____ | _____ | I |

Comments: _____

4. Is hazardous waste accumulated in other than tanks or containers? If yes, explain _____.

_____	____/____	_____	N/A
-------	-----------	-------	-----

Comments: _____

INSPECTION FORM D

CLOSURE AND POST CLOSURE (Part 265 Subpart G)
 Part 7 of Act 64 Rules

	Yes	No	N/A	Violation Class
1. Closure 265.112				
a.) Is the facility closure plan available for inspection?	/	—	—	I
b.) Does the plan identify				
i. maximum extent unclosed during facility life?	/	—	—	I
ii. maximum hazardous waste inventory?	/	—	—	I
iii. estimated year of closure	/	—	—	I
iv. schedule of closure activities	/	—	—	I

Comments:

60,700 ± effective May 1989

*2. Post-Closure 265.118 - Act 64 Rules

a.) Is the post-closure plan available for inspection?	—	—	—	I
b.) Does this plan contain:				
i. description of groundwater monitoring activities and frequencies?	—	—	—	I
ii. description of maintenance activities and frequencies for				
AA. integrity of cap. final cover, or containment structures, where applicable.	—	—	—	I
BB. facility monitoring equipment.	—	—	—	I

INSPECTION FORM D

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Violation</u> <u>Class</u>
iii. name, address, and phone number of person or office to contact during post- closure care period?	_____	_____	_____	I _____
c.) Has the post-closure period begun?	_____	_____	_____	N/A _____
d.) Is the written post-closure cost estimate available? 265.144	_____	_____	_____	I _____

Comments: _____

* Applies only to disposal facilities.

			Violation
Yes	No	N/A	Class

GENERATOR APPENDIX

Section A: Scope

Complete this Appendix if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

Manifest Requirements

1. a.) Does the generator have copies of the manifest available for review and on-site. 282.40
- b.) Examine manifests for shipments in past 6 months. Indicate approximate number of manifested shipments during that period.

II

240

Comments:

2. Do the manifest forms examined contain the following information (If so, make copies of, or record information from manifests that do not contain the critical elements:

- a.) Manifest document number (Rule 304(2)(a)?

II

- b.) The generator's name, mailing address, telephone number, and EPA Identification number. Rule 204(2)(b)

II

- c.) The name and EPA ID number of transporter. Rule 304(2)(c)

II

- d.) Name, address, and EPA ID number of designated permitted facility and alternate facility. Rule 304(2)(d)

II

- e.) The description of waste(s) (DOT shipping name, DOT hazard class, DOT identification number. Rule 304(2)(e)

II

GENERATOR APPENDIX

Violation
Class

Yes

No

N/A

Class

f.) The total quantity of waste(s)
and the type and number of con-
tainers loaded. Rule 304(1)(f)

II

g.) Hazardous waste number describing
the wastes. Rule 304(1)(g)

II

h.) Certification as required in
Rule 304(1)(h)

II

i.) Signatures as required in
Rule 304(4)

I

j.) Waste minimization program/
certification

I

Comments:

3. Reportable exceptions. Rule 308(3), 40 CFR 262.42

a.) For manifests examined in (2)
(except for shipments within
the last 35 days), enter the
number of manifests for which
the generator has NOT received
a signed copy from the designated
facility within 35 days of the
date of shipment.

I

b.) For manifests indicated in (4a),
enter the number for which the
generator has submitted excep-
tion reports (40 CFR 262.42) to
the Regional Administrator.

Comments:

RCRA LAND DISPOSAL RESTRICTION INSPECTION

Facility: REICHOID CHEMICAL, INC
 U.S. EPA I.D. No.: MD 020087128
 Street: REICHOID CHEMICAL, INC - 601 Woodward Heights
 City: Ferndale State: MI Zip Code: 48220
 Telephone: (313) 542 0270

Operator: _____
 Street: 601 Woodward Heights
 City: Ferndale State: MI Zip Code: 48220
 Telephone: _____

Owner: _____
 Street: _____
 City: _____ State: _____ Zip Code: _____
 Telephone: _____

Inspection Date: 9/8/89 Time: 10:30 Weather Conditions: Clear

	<u>Name</u>	<u>Affiliation</u>	<u>Telephone</u>
Inspectors:	<u>DONALD MBAMA</u>	<u>MDNR</u>	<u>(313) 344 4670</u>

Facility Representatives: John Yonke

	<u>RCRA Status</u>	<u>E-Solvent</u>	<u>LDR Status</u> <u>California List</u>	<u>First Third</u>
Generator	<u>✓</u>	_____	_____	_____
Transporter	_____	_____	_____	_____
Treater	_____	_____	_____	_____
Storer	<u>✓</u>	_____	_____	_____
Disposer	_____	_____	_____	_____

RCRA LAND DISPOSAL RESTRICTION INSPECTION

GENERATOR CHECKLIST

GENERATOR REQUIREMENTS

A. BDAT Treatability Group - Treatment Standards Identification

1. F-Solvent Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

_____ Yes _____ No _____ NA

If yes, check the appropriate treatability group.

- _____ Wastewaters containing solvents (less than or equal to 1% TOC by weight)
_____ Pharmaceutical wastewater containing
_____ spent methylene chloride
_____ All other spent solvent wastes

2. California List Wastes: Does the generator correctly determine the appropriate treatment standard of the waste?

- a. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 50 but less than 500 ppm, is the treatment in accordance with existing TSCA thermal treatment regulations for burning in high efficiency boilers (40 CFR 761.60) or incineration (40 CFR 761.70)?

_____ Yes _____ No _____ NA

If yes, specify the method: _____

- b. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 500 ppm, is the waste incinerated or disposed of by other approved alternate methods (40 CFR 761.60 (c))?

_____ Yes _____ No _____ NA

If yes, specify the method and state whether the facility has submitted a written request to the Regional Administrator or Assistant Administrator for an exemption from the incineration requirement:

3. First Third Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

_____ Yes _____ No _____ NA

If yes, check the appropriate treatability group.

_____ Wastewater (less than 1% TOC by weight and less than 1% filterable solids)
 _____ Nonwastewaters

List the waste code and check the correct treatment standard group.

Waste Code	Wastewater	Nonwastewater
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

B. Waste Analysis

1. F-Solvent Wastes

- a. Does the generator determine whether the F-solvent waste exceeds treatment standards?

☒ Yes _____ No _____ NA

How was this determination made?

- Knowledge of waste

☒ Yes _____ No

If yes, is any supporting data available for review? Describe how this is adequate. _____

- TCLP

_____ Yes _____ No

If yes, provide the date of last test, the frequency of testing, and note any problems. Attach test results.

- b. Does the F-solvent waste exceed applicable treatability group treatment standards upon generation [268.7(a)(2)]?

☒ Yes ☐ No ☐ NA

If yes, specify the waste stream: _____

FOO 3

- c. Does the generator dilute the F-solvent waste as a substitute for adequate treatment [268.3]?

☐ Yes ☒ No ☐ NA

- d. How does the generator test F-solvent waste when a process or waste stream changes?

2. California List Wastes

- a. Does the generator determine whether the waste is a liquid according to the Paint Filter Liquids Test (PFLT method 9095) as described by SW-846?

☐ Yes ☐ No ☐ NA

- b. If the waste is determined to be a liquid according to PFLT, is an absorbent added to the waste?

☐ Yes ☐ No ☐ NA

What type of absorbent is used? _____

Check the types of waste to which absorbent is added. _____

☐ Liquid hazardous waste having a pH less than or equal to 2

☐ Liquid hazardous waste containing metals

☐ Liquid hazardous waste containing free cyanides

- c. Does the generator determine whether the concentration levels (not extract or filtrate) in the waste equal or exceed the prohibition levels or whether the waste has a pH of less than or equal to 2.0 based on:

- Knowledge of wastes

☐ Yes ☐ No ☐ NA

If yes, is any supporting data available for review? Describe how this is adequate. _____

- Testing _____ Yes _____ No _____ NA

If yes, list test method used: _____

d. Does the generator determine if concentration levels in the PFLT filtrate exceed cyanide and metals concentration levels?

_____ Yes _____ No _____ NA

- If yes, list test method used and constituent and concentration levels that exceeded prohibition levels: _____

e. Does the generator dilute the waste as a substitute for adequate treatment [268.3]?

_____ Yes _____ No _____ NA

3. First Third Wastes:

a. Does the generator correctly determine the appropriate treatment standard of the waste?

_____ Yes _____ No _____ NA

Note: The treatment standards for first third wastes are given in Appendix D.

b. Does the generator determine whether the First Third waste exceeds treatment standards upon generation?

_____ Yes _____ No _____ Soft hammer

If yes, specify the waste stream: _____

How was this determination made?

- Knowledge of waste

_____ Yes _____ No

If yes, is any supporting data available for review? Describe how this is adequate. _____

- TCLP

☐ Yes ☐ No ☐ NA

- Total Constituent Analysis

☐ Yes ☐ No ☐ NA

Provide the date of last test, the frequency of testing, and note any problems. Attach test results.

- c. Does the generator dilute the waste as a substitute for adequate treatment [268.3]?

☐ Yes ☐ No ☐ NA

- d. How does the generator test the waste when a process or waste stream changes?

C. Management

1. On-Site Management

Is restrict waste or waste that exceeds the treatment standards treated, stored, or disposed on-site?

☒ Yes ☐ No

If yes, the TSD Checklist must be completed.

2. Off-Site Management

- a. Does the generator ship any waste that exceeds the treatment standards to an off-site treatment or storage facility?

☒ Yes ☐ No

- b. Does the generator provide notification to the treatment or storage facility [268.7(a)(1)]?

☒ Yes ☐ No

c. Does notification contain the following?

EPA Hazardous waste number(s)	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Applicable treatment standards	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Manifest number	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Waste analysis data, if available	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No

Identify off-site treatment or storage facilities: _____

d. Does the generator ship any waste that meets the treatment standards to an off-site disposal facility?

_____ Yes _____ No

e. Does the generator provide notification and certification to the disposal facility [268.7(a)(2)]?

_____ Yes _____ No

f. Does notification contain the following?

EPA Hazardous waste number(s)	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Applicable treatment standards	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Manifest number	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Waste analysis data, if available	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Certification that the waste meets treatment standards	<input type="checkbox"/> Yes	<input type="checkbox"/> No

Identify off-site land disposal facilities: _____

g. Is the waste subject to a nationwide variance, case by case extension (268.5), or petition (268.6)?

_____ Yes _____ No _____ NA

h. If yes, does the generator provide notification to the off-site receiving facility that the waste is not prohibited from land disposal [268.7(a)(3)]?

_____ Yes _____ No

- i. If yes, does the notification contain the following information?

EPA Hazardous waste number	<input type="checkbox"/> Yes	<input type="checkbox"/> No
The corresponding treatment standards and all applicable prohibitions	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Manifest number	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Waste analysis data, if available	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Date the waste is subject to the prohibitions	<input type="checkbox"/> Yes	<input type="checkbox"/> No

- j. Does the generator retain copies of all notices and certifications for a period of 5 years?
- ☐ Yes ☐ No

D. Demonstration and Certification -- "Soft Hammer" Wastes

- a. Has the generator attempted to locate and contract with treatment and recovery facilities that provide treatment that yields the greatest environmental benefit [268.3(a)(1)]?
- ☐ Yes ☒ No
- b. Has the generator submitted to the Regional Administration a demonstration and certification containing the following information to document its efforts to locate practically available treatment:

A list of facilities and facility officials contacted?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Addresses	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Telephone Numbers	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Contact dates	<input type="checkbox"/> Yes	<input type="checkbox"/> No

Attach a copy of the demonstration and certification

- c. If the generator has determined that there is no practically available treatment for its wastes, has it sent documentation to EPA demonstrating why it was not able to obtain treatment or recovery for the waste?
- ☐ Yes ☐ No

If yes, attach a copy of written discussion.

RCRA LAND DISPOSAL RESTRICTION INSPECTION

TSD CHECKLIST

TSD REQUIREMENTS

A. General Facility Standards

1. Does the waste analysis plan cover Part 268 requirements [264.13 or 265.13]?
 - o F-solvent ☐ Yes ☒ No ☐ NA
 - o California List ☐ Yes ☐ No ☐ NA
 - o First Third ☐ Yes ☐ No ☐ NA
2. Does the facility obtain representative chemical and physical analyses of wastes and residues?
☒ Yes ☐ No
 - a. What date was the waste analysis plan last revised? _____
 - b. Are analyses conducted on-site or off-site?
☐ On-site ☒ Off-siteIdentify off-site lab: _____

 - c. Is F-solvent waste analyzed using TCLP?
☐ Yes ☒ No ☐ NA
 - d. Is First Third waste analyzed using the analytical method that is appropriate for the objective of the specified BDAT (i.e., total constituent analysis for destruction technologies and TCLP for stabilization/fixation technologies)?
☒ Yes ☐ No ☐ NA

Note: The appropriate analytical methods (TCLP or total constituent) for first third wastes with specified treatment standards are given in Appendix D.

 - c. Describe the frequency of sampling: _____

3. Are the operating records, including analyses and quantities, complete [264.73/265.73]?

☒ Yes ☐ No

B. Storage (268.50)

1. Are restricted wastes stored on-site?

☐ Yes ☐ No

If no, go to C, Treatment.

2. If yes, check the appropriate method.

☒ Tanks
☒ Containers

3. Are all containers clearly marked to identify the contents and date(s) entering storage?

☒ Yes ☐ No ☐ NA

4. Do operating records track the location, quantity of the wastes, and dates that the wastes enter and leave storage?

☒ Yes ☐ No

5. Do operating records agree with container labeling?

☒ Yes ☐ No ☐ NA

6. Do operating records contain copies of the notice, certification, and demonstration (if applicable) from the generator for the past 5 years?

☐ Yes ☐ No

7. Have wastes been stored for more than 1 year since the applicable LDR regulations went into effect?

____ Yes ☒ No ____ NA

If yes, can the facility show that such accumulation is necessary to facilitate proper recovery, treatment, or disposal?

____ Yes ____ No

If yes, state how: _____

8. Have tanks been emptied at least once per year since the applicable LDR regulations went into effect?

____ Yes ____ No ____ NA

If yes, do the operating records show that the volume of waste removed from tanks annually equals or is more than the tank volume?

____ Yes ____ No

9. Are all tanks clearly marked with a description of the contents, the quantity of wastes received, and date(s) entering storage, or is such information recorded and maintained in the operating record?

____ Yes ____ No ____ NA

C. Treatment

1. Does the facility treat restricted wastes other than in surface impoundments?

____ Yes ____ No

If no, go to D, Treatment in Surface Impoundments.

2. Describe the treatment processes:

3. Does the facility, in accordance with an acceptable waste analysis plan, determine whether the residue or residue extract (for treatment standards expressed as concentrations in the waste extract) from all treatment processes is less than treatment standards [268.7(b)]?

_____ Yes _____ No

4. Is dilution used as a substitute for treatment?

_____ Yes _____ No

6. Are notifications, demonstration, and certification (if applicable) prepared by the generators kept in the facility's operating record?

_____ Yes _____ No

7. Does the facility ship any waste or treatment residue that meets the treatment standards to an off-site disposal facility?

_____ Yes _____ No _____ NA

If yes, does the treatment facility provide notification and certification to the disposal facility?

_____ Yes _____ No

If yes, does notification contain the following?

EPA Hazardous waste number(s)	_____ Yes	_____ No
Applicable treatment standards	_____ Yes	_____ No
Manifest number	_____ Yes	_____ No
Waste analysis data, if available	_____ Yes	_____ No
Certification that the waste meets the treatment standards	_____ Yes	_____ No

Identify off-site disposal facilities: _____

8. Does the facility ship any "soft hammer" waste to an off-site disposal facility?

_____ Yes _____ No _____ NA

If yes, does the treatment facility send a copy of the generator's demonstration (if applicable) and certification to the disposal facility?

_____ Yes _____ No

D. Treatment in Surface Impoundments

1. Are restricted wastes placed in surface impoundments for treatment?

_____ Yes _____ No

If no, go to E, Land Disposal.

2. If yes, did the facility submit to the Agency the waste analysis plan and certification of compliance with minimum technology and ground-water monitoring requirements?

_____ Yes _____ No

3. If the minimum technology requirements have not been met, has a waiver been granted for that unit?

_____ Yes _____ No _____ NA

4. Are representative samples of the sludge and supernatant from the surface impoundment tested separately, acceptably, and in accordance with the sampling frequency and analysis specified in the waste analysis plan?

_____ Yes _____ No

Attach test results.

5. Do the hazardous waste residues (sludges or liquids) exceed the treatment standards specified in 268.41, or where no treatment standards are established for a waste, the applicable prohibition levels?

_____ Yes _____ No

6. Provide the frequency of analyses conducted on treatment residues: _____

7. Does the operating record adequately document the results of waste analyses performed in accordance with 268.41?

_____ Yes _____ No

8. Do the hazardous waste residues exceed the treatment standards (268.41) or do not meet the prohibition levels?

Sludge _____ Yes _____ No

Supernatant _____ Yes _____ No

- a. If yes, are sludge and supernatant removed adequately on an annual basis?

_____ Yes _____ No

- b. Are adequate precautions taken to protect liners, and do records indicate that liner integrity is inspected?

_____ Yes _____ No

- c. Are residues subsequently managed in another surface impoundment?

_____ Yes _____ No

- d. Are residues treated prior to disposal?

_____ Yes _____ No

If yes, are waste residues treated on-site or off-site?

_____ On-site _____ Off-site

Identify treatment method: _____

E. Land Disposal

1. Are restricted wastes placed in land disposal units such as landfills, surface impoundments, waste piles, wells, land treatment units, salt domes/beds, mines/caves, or concrete vault or bunker?

_____ Yes _____ No

Note: Do not include surface impoundments addressed in D, Treatment in Surface Impoundments.

If yes, specify which units and what wastes each unit has received: _____

2. Are these wastes disposed of in a new, replacement, or laterally expanded landfill or impoundment that meets the minimum technology requirements (double liner and leachate collection) and groundwater monitoring?

_____ Yes _____ No

3. Does the facility operating record have notices, certifications, and demonstration (if applicable) from generators/storer/treaters for 5 years [268.7(c); 268.7(a),(b)]?

_____ Yes _____ No

4. Does the facility obtain waste analysis data or test the wastes (according to the waste analysis plan) to determine that the wastes comply with the applicable treatment standards [268.7(c)]?

_____ Yes _____ No

If yes, at what frequency? _____

5. If restricted wastes that exceed the treatment standards are placed in land disposal units (excluding national capacity variances) [268.30(a)], does facility have an approved waiver based on no migration petition [268.6], an approved case-by-case capacity extension [268.5], or variance [268.44]?

_____ Yes _____ No

6. Does the facility dispose of restricted wastes that are subject to a national capacity variance?

_____ Yes _____ No

7. Does the facility have notices [268.7(a)(3)] and records of disposal for disposed wastes that are subject to a national capacity variance, case-by-case extensions [268.5], or no migration petitions [268.6]?

____ Yes ____ No ____ NA

8. What is the volume of the restricted wastes disposed of to date?

9. If the facility has a case-by-case extension, is the facility making progress as described in progress reports?

____ Yes ____ No ____ NA

STATE OF MICHIGAN



NATURAL RESOURCES COMMISSION

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JAMES J. BLANCHARD, Governor
DEPARTMENT OF NATURAL RESOURCES

STEVENS T. MASON BUILDING
BOX 30028
LANSING, MI 48909

RONALD O. SKOOG, Director

RECEIVED

AUG 29 1985

SWB - AIS
U.S. EPA, REGION V

August 26, 1985

Ms. Edith Ardiente, Chief
Technical Programs Section, 5HS-13
U.S. EPA-Region V
230 South Dearborn
Chicago, Illinois 60604

RECEIVED

AUG 29 1985

SOLID WASTE BRANCH
U.S. EPA-REGION V

Re: Request for Increase in Capacity
Reichhold Chemicals, Inc.
Ferndale, Michigan
MID 020087128 G, TSD, PA

Dear Ms. Ardiente:

We have reviewed the above-referenced request for an increase in capacity. I discussed the request with the company representative, John Yonke, to get some additional information. The company wishes to add a 5,200-gallon tank in which to store resin/solvent wastes prior to burning them in a boiler. The proposed tank is already located adjacent to the existing 450-gallon tank.

After discussing the situation with Mr. Yonke, I learned that the company only stores on-site generated wastes, typically for less than 90 days. If the company were to certify that they always dispose of the wastes within 90 days, they could change their status to a generator, rather than a storage facility, and a Part A application would not be necessary. On the state level, if the company consistently stores waste for less than 90 days, the operation would also be exempt from regulation as a storage facility.

However, if the company intends to store waste for greater than 90 days, EPA will have to grant an approval for a change during interim status, and the company should be made aware that they will eventually be required to submit a Part B application for their storage facility. On the state level, the new storage tank would be "grandfathered in" if it is put into use prior to the effective date of our new Act 64 rules and would only need an operating license (at the time operating licenses are issued by this office for all such storage facilities). If the new storage tank is not put into use prior to the effective date of our new Act 64 rules, the company would have to obtain both a construction permit and an operating license prior to using the tank.

A state air permit is required for the tank.

Ms. Edith Ardiente
U.S. EPA - Region V
August 26, 1985
Page 2

Please contact me if you have any questions or wish to discuss this further.

Sincerely,

A handwritten signature in cursive script that reads "Cheryl Howe".

Cheryl Howe, Environmental Engineer
Technical Services Section
Hazardous Waste Division
517-373-2730

cc: John Yonke, Reichhold Chemicals
Carol Witt, Region V EPA
Mary Murphy, Region V EPA
Ben Okwumabua/Ken Damrel
Ken Burda
John Trout, Air Quality Division
C & E File
File

JUL 02 1985

Mr. Alan J. Howard
 Chief, Technical Services Section
 Hazardous Waste Division
 Michigan Department of Natural Resources
 P.O. Box 30028
 Lansing, Michigan 48909

RE: Request for Increase in Capacity
 Reichold Chemicals, Inc.
 Ferndale, MI
 MID 020 087 128

Dear Mr. Howard:

Enclosed is one copy of a request for an increase in capacity for the referenced facility. Please perform a technical evaluation of the request, and provide us your comments by August 2, 1985.

If you have any questions on the request, please contact Carol Mitt on my staff, at (312) 886-6146.

Sincerely,

James H. Hayka
 Chief, Michigan Unit

Enclosure(s)

cc: Mary Higgins
 HMD/IS Update File

5HS-13:SVB:TPS:MI:C.Mitt:G.Words:6/26/85

	TP.	AUTH.	IL CHIEF	DE CHIEF	REL CHIEF	RM/WI CHIEF	ON CHIEF	TPS CHIEF	WMD CHIEF	WMD DIR
ONE JHR	9.21 7/1/85	CU 7/1/85			Am 7-3-85					

5FL-5

P 593 667 901

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL

(See Reverse)

PS Form 3800, Feb. 1982
MID 020 087 128
U.S.G.P.O. 1983-403-517
Sharon Johnson

Sent to <u>Fred Trump, Vice President</u> <u>Reichhold Chemicals, Inc</u>	
Street and No. <u>601 Woodward Hts, Blvd.</u>	
P.O., State and ZIP Code <u>Ferndale, Michigan 48220</u>	
Postage	\$ <u>22</u>
Certified Fee	<u>.75</u>
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to whom and Date Delivered	<u>.70</u>
Return receipt showing to whom Date, and Address of Delivery	
TOTAL Postage and Fees	\$ <u>24.67</u>
Postmark or Date <u>APR 29 1985</u> USPO	

PS Form 3811, July 1982

MID 020 087 128 Ltr of Warnin

• **SENDER:** Complete items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
☐ Show to whom and date delivered
☐ Show to whom, date, and address of delivery ..
 2. ☐ **RESTRICTED DELIVERY**
 (The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL \$

3. ARTICLE ADDRESSED TO: Fred Trump, Vice Pres.
Reichhold Chemicals, Inc
601 Woodward Hts Blvd.
Ferndale, Michigan 48220

4. TYPE OF SERVICE: ☐ REGISTERED ☐ INSURED ☐ CERTIFIED ☐ COD ☐ EXPRESS MAIL
 ARTICLE NUMBER P 593 667 901

(Always obtain signature of addressee or agent)

I have received the article described above.
 SIGNATURE ☐ Addressee ☐ Authorized agent
George Clark

5. DATE OF DELIVERY APR 29 1985
 POSTMARK (May be on reverse side)
APR 29 1985

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE: EMPLOYEE'S INITIALS
[Signature]

RETURN RECEIPT
S. Johnson

APR 25 1985

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Fred Trump, Vice President
Reichhold Chemicals, Inc.
601 Woodward Hts. Blvd.
Ferndale, Michigan 48220

Re: Letter of Warning
Reichhold Chemicals, Inc.
MID 020 087 128

Dear Sir:

The above referenced facility is a hazardous waste treatment, storage or disposal facility subject to the Resource Conservation and Recovery Act (RCRA), as amended. Federal regulations (40 CFR Part 265, Subpart H) require that such facilities provide the United States Environmental Protection Agency (U.S. EPA) with proof of liability coverage.

We have received your letter dated March 21, 1985. However, we have not received the new certificate of liability insurance pursuant to 40 CFR 265.147. Please forward the proof of liability coverage within 21 days of receipt of this notice to:

U.S. EPA - 5HE-12
Attn: Sharon R. Johnson
230 S. Dearborn Street
Chicago, Illinois 60604

If you have any questions or desire additional information, please contact Ms. Sharon R. Johnson of my staff, at (312) 353-1429.

Sincerely,

William E. Muno, Chief
RCRA Enforcement Section

SRJOHNSON:srj:5HE-12:4-23-85

INITIALS	TYPYST	AUTHOR	STU #1 CHIEF	STU #2 CHIEF	STU #3 CHIEF	TPS CHIEF	WMB CHIEF	WMD DIRECTOR
DATE	<i>[Signature]</i>	<i>[Signature]</i>	<i>[Signature]</i> RIC 4-24-85			<i>[Signature]</i> 4/24/85		

REICHHOLD®

CORPORATE HEADQUARTERS: 525 NORTH BROADWAY, WHITE PLAINS, NEW YORK 10603

TELEPHONE: (914) 682-5700

TWX: 7105681373

CABLE: BECKACITE WHITE PLAINS

RECEIVED
APR 08 1985

Address Reply To
REICHHOLD CHEMICALS, INC.
601-707 Woodward Heights Boulevard
Ferndale, Michigan 48220
(313) 564-6500 / (313) 542-0200

April 4, 1985

WMD-BIU
EPA, REGION V

RCRA Activities
Region V
P.O. Box A3587
Chicago, Illinois 60690

Re: Reichhold Chemicals, Inc. - MID 020087128 G, TSD, PA

Gentlemen:

This letter is to notify you that we are reviewing the new regulations requiring the EPA to be notified of any previously exempt operations which may be subject to coverage under the new regulations.

We have two diked storage tanks that may fall under these new guidelines. They contain a mixture of butyl alcohol (NALL20) and water derived from one of our processes. This material is recycled.

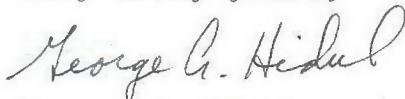
The tanks are designated:

	<u>Capacity</u>
ST - 98	10,500 gallons
ST - 102	10,500 gallons

Also, we would like added to our Part A, 5,200 gallon mixing tank designated as ST-50, that would increase our working capacity of an existing 450 gallon tank already covered under interim status. This addition along with the existing tank will be used in the process of handling waste fuel for the purpose of burning in a boiler covered under Michigan Permit #779-79.

Please let me know if any additional information is required.

Very truly yours,



George A. Hiduk
Plant Manager

STATE OF MICHIGAN



S.E. Michigan Field Office
15500 Sheldon Road
Northville, MI 48167

NATURAL RESOURCES COMMISSION

THOMAS J. ANDERSON
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O. STEWART MYERS
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JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

RONALD O. SKODG, Director

March 20, 1985

Reichhold Chemical Co.
601 - 607 Woodward Heights Blvd.
Ferndale, MI 48220
Attn: George A. Hiduk; Plant Manager

RE: MID 020087128

Dear Mr. Hiduk:

This letter is to acknowledge receipt of your letter dated March 18, 1985, indicating your compliance program for RCRA deficiencies cited during my inspection on December 6, 1984. I consider your response acceptable at this time and will evaluate the adequacy of your program during future inspections.

Thank you for your cooperation. If you have any questions, please feel free to contact me at (313) 459-9180.

Sincerely,

A handwritten signature in cursive script, appearing to read "Laura Lodisio".

Laura Lodisio
HAZARDOUS WASTE DIVISION

cc: U.S. EPA Region V
B. Okwumabua

REICHOLD®

MAR 19 1985

HAZARDOUS WASTE DIV

CORPORATE HEADQUARTERS: 525 NORTH BROADWAY, WHITE PLAINS, NEW YORK 10603

TELEPHONE: (914) 682-5700

TWX: 7105681373

CABLE: BECKACITE WHITE PLAINS

Address Reply To
601-707 WOODWARD HEIGHTS BLVD.
DETROIT, MICHIGAN 48220

(313) 564-6500

March 18, 1985

State of Michigan, DNR
Hazardous Waste Division
S.E. Michigan Field Office
15500 Sheldon Rd.
NORTHVILLE, Michigan 48167

Attention: Laura L. Lodisio

Gentlemen:

Following is our response to correct the violations you found at our location during your RCRA inspection on December 6, 1984.

1. Training records are available for your inspection, including the content of the material taught.
2. A copy of the "Contingency Plan" will be submitted by March 22, 1985 to the following organizations for their review along with a letter they are to return if they give their approval:
 - a) Ferndale Fire Department
 - b) Ferndale Police Department
 - c) Beaumont Hospital
3. The facility "Contingency Plan" (and PIPP) has been updated to reflect changes in personnel.
4. Facility evacuation plan for the area involving the hazardous waste is covered in the Contingency Plan listed in "RCI Personnel Training for Hazardous Waste Management" manual.
5. The material in question is put on a production log and listed by product code in the inventory system. At the time this product is no longer needed, it is identified as hazardous waste and moved to the hazardous waste storage area.

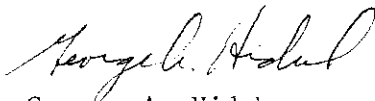
Mar March 18, 1985

At any given time, there is a small accumulation of production by-products which are continuously being classified as waste and moved to the hazardous waste area.

6. An updated Closure Plan has been submitted to Dr. B. Okwumabua for your approval.

If you have any questions on the above, please advise.

Very truly yours,



George A. Hiduk
Plant Manager

GAH/bjh

STATE OF MICHIGAN



S.E. Michigan Field Office
15500 Sheldon Road
Northville, MI 48167

NATURAL RESOURCES COMMISSION

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JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

RONALD O. SKOOG, Director

March 13, 1985

Reichhold Chemical Co.
601 - 607 Woodward Heights Blvd.
Ferndale, MI 48220
Attn: George A. Hiduk; Plant Manager

RE: MID 020087128

Dear Mr. Hiduk:

On December 10, 1984, I forwarded a letter to your attention citing several RCRA violations found during my inspection of your facility on December 6, 1984. A written response was requested by January 15, 1985.

I have spoken to you per telephone regarding this matter and also to Mr. John Yonke of your staff on several occasions. Mr. Yonke indicated that the response has been delayed due to several unforeseen circumstances but assured me that every effort was being made to resolve all existing problems and to bring the facility back into compliance with the requirements of RCRA. However, to this date I have received no response.

We require that a written response providing documentation that you have taken corrective action be submitted no later than March 27, 1985. Failure to do so will result in a recommendation for further enforcement action by this agency and/or the U.S.EPA.

If you have questions and/or concerns on this matter do not hesitate to call me at (313) 459-9180.

Sincerely,

A handwritten signature in cursive script, appearing to read "Laura Lodidio".

Laura Lodidio
HAZARDOUS WASTE DIVISION

cc: U.S. EPA Region V
B. Okwumabua
J. Bohunsky

NATURAL RESOURCES COMMISSION

THOMAS J. ANDERSON
E. R. CAROLLO
JACOB A. HOEFER
STEPHEN F. MONSMA
HILARY F. SNELL
PAUL H. WENDLER
HARRY H. WHITELEY



JAMES J. BLANCHARD, Governor

S.E. Michigan Field Office
15500 Sheldon Road
Northville, MI 48167

DEPARTMENT OF NATURAL RESOURCES

RONALD O. SKOOG, Director

December 10, 1984

Reichhold Chemical Company
601-607 Woodward Heights Blvd.
Ferndale, MI 48220

RE: MID 020087128

Dear Mr. Hiduk:

On December 6, 1984, acting as a representative of the United States Environmental Protection Agency, I performed an inspection of your facility located at 601-607 Woodward Heights Blvd., Ferndale, Michigan. The purpose of that inspection was to evaluate compliance of that facility with the requirements of Subtitle C of the Resource Conservation and Recovery Act (RCRA) as amended.

As a result of that inspection, it has been determined that the above facility is in violation of some of the requirements of Subtitle C of RCRA. Specifically, the following was found:

1. Training records and documents on current personnel were unavailable for review at the time of the inspection as required per 40 CFR 265.16(d) (e). Though you indicated that these do exist, you were not able to locate them, as John Yonke, your environmental coordinator, was absent at the time.
2. There was no documentation available which indicated that a copy of your contingency plan has been submitted to local emergency response agencies as required per 40 CFR 265.37 and 265.52. A letter dated March 2, 1984 from Mr. John Yonke of your staff stated that this would be done with return letters from the agencies requested.
3. The facility contingency plan has not been revised to reflect change in personnel (i.e. - plant manager) as required per 40 CFR 265.54.
4. The facility evacuation plan as required per 40 CFR 265.52(f) was not included in your contingency plan. Though this may not have been located due to the absence of Mr. John Yonke it should be readily accessible to plant personnel at all times.
5. As discussed at the time of the inspection, though you keep an inventory of all hazardous waste which is in the drum storage area on the east side of your facility there was no log of the hazardous waste drums which were in "holding areas" prior to being put in the diked area. These areas were located on the west side of the site. You indicated that there was a system of keeping a log on this waste; however, it was not clear at the time. The operating log must keep an accurate record of the locations of each hazardous waste within the facility and the quantity at each location as required per 40 CFR 265.73(b).

6. It was not clear if the closure plan on file at your facility has been updated to reflect current costs. It appeared that the plan reflected 1983 cost estimates. Please clarify this matter.

You are requested to respond to this letter by January 15, 1985, providing documentation to this office regarding those actions taken to correct these violations. If you have any questions regarding this matter, please feel free to contact me at (313) 459-9180.

Sincerely,



Laura L. Lodisio
HAZARDOUS WASTE DIVISION

cc: U.S. EPA, Region V
B. Okwumabua

RCRA Inspection Report

EPA Identification Number: MI D 020087128Installation Name: REICHHOLD CHEMICAL CO.Location Address: 601-607 WOODWARD HEIGHTS BLVD.City: DETROIT State: MI 48220Date of inspection: 12/26/84 Time of inspection (from) 10:00 (to) 2:00

Person(s) interviewed

Title

Telephone

George A. Hiduk Plant Manager 313/542-0200

(*Note: John Youke who is the usual contact for H.W. matters was not in at the time; therefore there were some records, etc. which were unavailable.)

Inspector(s)

Agency/Title

Telephone

Laura LodigioMDNR313/459-9180Anne PeppoEnvir. SpecialistAir Quality Specialist 313/459-1940

Installation Activity (mark only one box)

Inspection Form(s)

☒ Treatment/Storage/Disposal per 40 CFR 265.1 and/or
Generation and/or Transportation

A

☐ Treatment/Storage/Disposal (no generation or Transportation)

A

☐ Generation and Transportation

B, C

☐ Generation only

B

☐ Transportation only

C

Not regulated as a treatment facility. Though company does burn hazardous waste it is exempt as per 40 CFR 261.6 since it is a legitimate re-use (for fuel). Anne Peppo of MDNR-Air Quality Div. accompanied me on this inspection as the Air Use Permit deals w/ the operation of the steam waste boiler.

INSPECTION FORM A

Section A: SCOPE OF INSPECTION.

1. Interim status standards for treatment storage or disposal of HAZARDOUS WASTES SUBJECT TO 40 CFR 265.1. Complete Inspection Form A sections B, C, D, E, and G.
2. Place an "X" in the box(es) corresponding to the facility's treatment, storage and disposal processes, and generation and/or transportation activity (if any). Complete only the applicable sections and appendixes.

Permit application process(es) (EPA Form 3510-3) Inspection Form A section(s)

S01	<input checked="" type="checkbox"/>	storage in containers	I
S02	<input type="checkbox"/>	storage in tanks	J
T01	<input type="checkbox"/>	treatment in tanks	J
S04	<input type="checkbox"/>	storage in surface impoundment	K,F
T02	<input type="checkbox"/>	treatment in surface impoundment	K,F
DB3	<input type="checkbox"/>	disposal in surface impoundment	K,F
S03	<input type="checkbox"/>	storage in waste pile	L
D81	<input type="checkbox"/>	disposal by land application	M,F
D80	<input type="checkbox"/>	disposal in landfill	N,F
T03	<input type="checkbox"/>	treatment by incineration	O/P
T04	<input type="checkbox"/>	treatment in devices other than tanks, surface impoundments, or incinerators	Q

Other activities

GENERATOR	<input checked="" type="checkbox"/>	APPENDIX	GN
TRANSPORTER	<input type="checkbox"/>	APPENDIX	TR

3. Indicate any hazardous waste processes, by process code, which have been omitted from Part A of the facility's permit application.
4. Indicate any hazardous waste processes (by process code and line number on EPA Form 3510-3 page 1 of 5) which appear to be eligible for exclusion per 40 CFR 265.1(c). Provide a brief rationale for the possible exclusion.

S02 - No longer storing H.W. in tanks.

Section B: GENERAL FACILITY STANDARDS: (Part 265 Subpart B)

YES NO NI* Remarks

1. Has the Regional Administrator been notified regarding: 265.12

a. Receipt of hazardous waste from a foreign source?

___ ___ ✓ Do not receive off-site waste

b. Facility expansion?

___ ___ ✓ Will be notifying of new tank installation.

c. Change of owner or operator?

___ ___ ✓ No change.

2. General Waste Analysis: 265.13

a. Has the owner or operator obtained a detailed chemical and physical analysis of the waste?

___ ✓ ___ - Waste is hazardous by definition (listed waste) or by knowledge of process materials. However, they analyze waste which is mixed w/ fuel for burning (Each batch sampled).

b. Does the owner or operator have a detailed waste analysis plan on file at the facility?

___ ___ ✓

c. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?

___ ___ ✓ No off-site wastes received.

3. Security - Do security measures include: (if applicable) 265.14

a. 24-Hour surveillance?
or

✓ ___ ___

b. i. Artificial or natural barrier around facility?
and

✓ ___ ___ Fence

ii. Controlled entry?

✓ ___ ___ Fence, Guards.

c. Danger sign(s) at entrance?

✓ ___ ___

4. Owner or operator inspections: 265.15

a. Does the owner or operator inspect the facility for malfunctions, deterioration, operator errors, and discharges of hazardous waste that may affect human health or the environment?

✓ ___ ___

*Not Inspected

YES NO NI Remarks

- b. Does the owner or operator have an inspection schedule at the facility?
- c. If so, does the schedule address the inspection of the following items:
- i. monitoring equipment?
 - ii. safety and emergency equipment?
 - iii. security devices?
 - iv. operating and structural equipment (i.e. dikes, pumps, etc.)?
 - v. type of problems to be looked for during the inspection (e.g. leaky fitting, defective pump, etc.)?
 - vi. inspection frequency (based upon the possible deterioration rate of the equipment)?
- d. Are areas subject to spills inspected daily when in use?
- e. Does the owner or operator maintain an inspection log or summary of owner or operator inspections?
- f. Does the inspection log contain the following information:
- i. the date and time of the inspection?
 - ii. the name of the inspector?
 - iii. a notation of the observations made?
 - iv. the date and nature of any repairs or remedial actions?

✓

✓ - Not applicable

- This is done either by in-house security Dept. or outside contractors (CO₂ + foam systems.)

not specified but general letter of instruction explains what inspection is to look for.

✓ Daily

✓ "

✓

✓

✓

have been none.

5. Do personnel training records include: 265.16

- a. Job titles?
- b. Job descriptions?

These were not available because John Enrole who keeps these records was not in on the day of inspection. 4/82-A

	YES	NO	NI	Remarks
c. Description of training?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<i>Procedures Manual - comprehensive</i>
d. Records of training?	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<i>Not available.</i>
e. Did facility personnel receive the required training by 5-19-81?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
f. Do new personnel receive required training within six months?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
g. Do personnel training records indicate that personnel have taken part in an annual review of initial training?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<i>??</i>
6. If required, are the following special requirements for ignitable, reactive, or incompatible wastes addressed? 265.17				
a. Special handling?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<i>- Explosion proof area.</i>
b. No smoking signs?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<i>- No smoking on plant site except designated areas.</i>
c. Separation and protection from ignition sources?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Section C: PREPAREDNESS AND PREVENTION: (Part 265 Subpart C)

1. Maintenance and Operation
of Facility: 265.31

Is there any evidence of fire,
explosion, or release of
hazardous waste or hazardous
waste constituent?

YES NO NI Remarks

— ✓ —

2. If required, does the facility
have the following equipment: 265.32

a. Internal communications or
alarm systems?

✓ — — P.A.

b. Telephone or 2-way radios
at the scene of operations?

✓ — —

c. Portable fire extinguishers,
fire control, spill control
equipment and decontamination
equipment?

✓ — — CO₂ + foam systems,
sprinklers, portable
extinguishers.

Indicate the volume of water and/or foam available for fire control:

8" city water main.

3. Testing and Maintenance of
Emergency Equipment: 265.33

a. Has the owner or operator
established testing and
maintenance procedures
for emergency equipment?

✓ — — Outside Contractors +

b. Is emergency equipment
maintained in operable
condition?

✓ — — In-house Security Dept.

4. Has owner or operator provided
immediate access to internal
alarms? (if needed) 265.34

✓ — —

5. Is there adequate aisle space
for unobstructed movement?

✓ — —

6. Has the owner or operator attempted
to make arrangements with local
authorities in case of an emergency
at the facility?

Because Mr. Forke was not
in, letters that were
sent to agencies were
not available.

Section D: CONTINGENCY PLAN AND EMERGENCY PROCEDURES: (Part 265 Subpart D)

	YES	NO	NI	Remarks
1. Does the Contingency Plan contain the following information: 265.52				
a. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Counter-measures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.)	✓			New "Procedures Manual" available
b. Arrangements agreed by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?				Documentation not available
c. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?	✓			No addresses.
d. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?	✓			
e. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)				Not clear.
2. Are copies of the Contingency Plan available at the site and local emergency organizations? 265.53			✓	

YES NO NI Remarks

3. Emergency Coordinator 265.55

a. Is the facility Emergency Coordinator identified?

☒

b. Is coordinator familiar with all aspects of site operation and emergency procedures?

☒

c. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?

☒

4. Emergency Procedures 265.56

If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?

☐ ☐ ☐ NA.

Section E: MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING: (Part 265 Subpart E)

	YES	NO	NI	Remarks
** 1. Use of Manifest System 265.71				
a. Does the facility follow the procedures listed in §265.71 for processing each manifest? (Particularly sending a copy of the signed manifest back to the generator within 30 days after delivery.)	—	—	—	<u>No off-site waste</u>
b. Are records of past shipments retained for 3 years?	—	—	—	↓
** 2. Does the owner or operator meet requirements regarding manifest discrepancies? 265.72	—	—	—	
** Not applicable to owners or operators of on-site facilities that do not receive any waste from off-site sources.				
3. Operating Record 265.73				
a. Does the owner or operator maintain an operating record as required in 265.73?	✓	—	—	<u>Daily entries indicate # drums into & out of H.W. Stg. areas (drum count). Waste listed by category - Waste to be shipped, burned, etc.</u>
b. Does the operating record contain the following information:				
i. The method(s) and date(s) of each waste's treatment, storage, or disposal as required in 40 CFR Part 265 Appendix I?	—	—	—	<u>However, it was only evident that drum count (inventory) was being kept at diped stg. area near trailer. There were several other areas on west side of R.R. tracks which were being used for holding areas (several 100 drums) These would be brought into main</u>
ii. The location and quantity of each hazardous waste within the facility? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.) (Not holding areas.)	—	—	—	
***iii. A map or diagram of each cell or disposal area				
*** only applies to disposal facilities				

showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)

iv. Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?

v. Reports detailing all incidents that required implementation of the Contingency Plan?

vi. All closure and post closure costs as applicable?

4. Availability of Records 265.74

Are all facility records required under 40 CFR Part 265 available for inspection?

5.**Unmanifested Waste Reports 265.76

a. Has the facility accepted any hazardous waste from an off-site generator subject to 40 CFR 262.20 without a manifest or or shipping paper?

b. If "a" is yes, provide the identity of the source of the waste and a description of the quantity, type, and date received for each unmanifested hazardous waste shipment.

Except certain portions which couldn't be located due to Mr. Yonke's absence at the time of inspection.

No off-site wastes.

** Not applicable to owners or operators of on-site facilities that do not receive any hazardous from off-site sources.

Section G - CLOSURE AND POST CLOSURE (Part 265 Subpart G)

	YES	NO	NI	Remarks
1. Closure 265.112				
a. Is the facility closure plan available for inspection?	✓			
b. Does the plan identify:				
i. maximum extent unclosed during facility life?	✓			
ii. maximum hazardous waste inventory?	✓			
iv. estimated year of closure?			✓	
v. schedule of closure activities?	✓			
c. Has closure begun?		✓		
*2. Post-Closure 265.118				
a. Is the post-closure plan available for inspection?				
b. Does this plan contain:				
i. description of groundwater monitoring activities and frequencies?				
ii. description of maintenance activities and frequencies for				
AA. integrity of cap, final cover, or containment structures, where applicable				
BB. facility monitoring equipment				
iii. name, address, and phone number of person or office to contact during post-closure care period?				
c. Has the post-closure period begun?				
d. Is the written post-closure cost estimate available? 265.144				

*Applies only to disposal facilities.

Section I - USE AND MANGEMENT OF CONTAINERS (Part 265, Subpart I)

	YES	NO	NI	Remarks
1. Are containers in good condition? 265.171	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Are containers compatible with waste in them? 265.172	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. Are containers managed to prevent leaks? 265.173	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. Are containers stored closed?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5. Are containers inspected weekly for leaks and defects.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. Are ignitable and reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive). 265.176	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<i>Appears so, however, containers of product are stored near prop. line.</i>
7. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply). 265.177	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
8. Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<i>No incompatible waste</i>

Section J - TANKS (Part 265, Subpart J)

YES NO NI Remarks

- | | | |
|--|---|--|
| 1. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank? 265.192 | — | The storage tanks which |
| 2. Do uncovered tanks have at least 60 cm (2 feet) of free-board, or dikes or other containment structures? | — | was added in an amended part A on 7/8/83 has been taken out of service. No |
| 3. Do continuous feed systems have a waste-feed cutoff? | — | longer in use for |
| 4. Are waste analyses done before the tanks are used to store a substantially different waste than before? 265.193 | — | hazardous waste (or any other type) Storage. |
| 5. Are required daily and weekly inspections done? 265.194 | — | Co. has no intention of receiving its use for such purpose. |
| 6. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.) 265.198 | — | purpose. |
| 7. Are incompatible wastes stored in separate tanks? 265.199 (If not, the provisions of 40 CFR 265.17(b) apply.) | — | — |
| 8. Has the owner or operator observed the National Fire Protection Associations buffer zone requirements for tanks containing ignitable or reactive wastes? | — | — |

Tank capacity: _____ gallons

Tank diameter: _____ feet

Distance of tank from property line _____ feet

(See table 2 - 1 through 2 - 6 of NFPA's "Flammable and Combustible Liquids Code - 1977" to determine compliance.)

Section A: Scope

1. Complete this Appendix if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

Section B: MANIFEST REQUIREMENTS (Part 262, Subpart B)

	YES	NO	NI	Remarks
(1) Does the operator have copies of the manifest available for review? 262.40	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(2) Examine manifests for shipments in past 6 months. Indicate approximate number of manifested shipments during that period.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Waste shipped to: - Gold Shield - Petro Chem - Wayne Disp. (solid filter cake) - Tricil
(3) Do the manifest forms examined contain the following information: (If possible, make copies of, or record information from, manifest(s) that do not contain the critical elements). 262.21				
a. Manifest document number?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b. Name, mailing address, telephone number, and EPA ID number of Generator	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c. Name and EPA ID Number of Transporter(s)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d. Name, address, and EPA ID Number Designated permitted facility and alternate facility?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
e. The description of the waste(s) (DDT shipping name, DOT hazard class, DOT identification number)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
f. The total quantity of waste(s) and the type and number of containers loaded?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
g. Required certification?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
h. Required signatures?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(4) Reportable exceptions 262.42				
a. For manifests examined in (2) (except for shipments within the last 35 days), enter the number of manifests for which the generator has <u>NOT</u> received a signed copy from the designated facility within 35 days of the date of shipment. <u>none</u>				
b. For manifests indicated in (4a), enter the number for which the generator has submitted exception reports (40 CFR 262.42) to the Regional Administrator. _____				

Section C: PRE-TRANSPORT REQUIREMENTS (Part 262, Subpart C)

	YES	NO	NI	Remarks
Is waste packaged in accordance with DDT regulations? (Required prior to movement of hazardous waste off-site) 262.30	_____	_____	_____	_____
2. Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required for movement of hazardous waste off-site) 262.31 262.32	_____	_____	_____	_____
3. If required, are placards available to transporters of hazardous waste? 262.33	_____	_____	_____	_____
4. On-site accumulation of generated hazardous wastes. A HWMF may accumulate hazardous waste it generates either (A) in its storage facility [265.1(b)] or (B) in accordance with 40 CFR 262.34 [see 265.1(c)(7)]. Option B restricts all accumulation to tanks and containers. If the installation elects option A, check this box <input checked="" type="checkbox"/> and skip to Section D. If the installation elects option B, complete the following observations: See 40 CFR 262.34 January 11, 1982 Revision				
a. Is each container clearly marked with the start of accumulation date?	_____	_____	_____	_____
b. Have more than 90 days elapsed since the date inspected in (a)?	_____	_____	_____	_____
c. Do wastes remain in accumulation tanks for more than 90 days?	_____	_____	_____	_____
d. Is each container and tank labeled or marked clearly with the words "Hazardous Waste"?	_____	_____	_____	_____

Section D: - RECORDKEEPING AND REPORTING (Part 262, Subpart D)

	YES	NO	NI	Remarks
1. Are all test results and analyses needed for hazardous waste determinations retained for at least three years? 262.40	_____	_____	_____	<i>all tested as haz. - No analysis</i>

Section E: - INTERNATIONAL SHIPMENTS (Part 262, Subpart E)

1. Has the installation imported or exported Hazardous Waste? 262.50	<input checked="" type="checkbox"/>	_____	_____	_____
(If answered Yes, complete the following as applicable.)				
a. Exporting Hazardous waste; has a generator:				

	YES	NO	NI	Remarks
i. Notified the Administrator in writing?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
ii. Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
iii. Met the Manifest requirements?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b. Importing Hazardous Waste; has the generator met the manifest requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	NA.

NATURAL RESOURCES COMMISSION
THOMAS J. ANDERSON
E. R. CAROLLO
JACOB A. HOEFER
STEPHEN F. MONSMA
HILARY F. SNELL
PAUL H. WENDLER
HARRY H. WHITELEY

STATE OF MICHIGAN



JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

STEVENS T. MASON BUILDING
BOX 30028
LANSING, MI 48909

RONALD O. SKOOG, Director

March 20, 1984

Hazardous Waste Division
1120 W. State Fair Ave.
Detroit, MI 48203

Reichhold Chemical Co.
601-707 Woodward Heights Blvd.
Detroit, MI 48220

EPA ID No: MID 020087128

Dear Mr. Yonke:

This letter is to acknowledge receipt of your letter dated March 2, 1984, indicating your compliance program for RCRA deficiencies cited during my inspection on February 1, 1984. I consider your response acceptable at this time and will evaluate the adequacy of your program during future inspections.

Thank you for your cooperation. If you have questions regarding Hazardous Waste Management please feel free to contact me at (313) 368-3335.

Sincerely,
HAZARDOUS WASTE DIVISION

Laura L. Lodisio
DETROIT DISTRICT OFFICE

LLL:pf

cc: J. Bohunsky
K. Burda
EPA

MID 0200 8728

REICHOLD® *Chemicals Inc*

CORPORATE HEADQUARTERS: 525 NORTH BROADWAY, WHITE PLAINS, NEW YORK 10603
TELEPHONE: (914) 682-5700 TWX: 7105681373 CABLE: BECKACITE WHITE PLAINS

Address Reply To
601-707 WOODWARD HEIGHTS BLVD.
DETROIT, MICHIGAN 48220
(313) 564-6500

March 4, 1983

RECEIVED

MAR 7 1983

Department of Natural Resources
Hazardous Waste Division
Detroit District Office
1120 W. State Fair Ave.
DETROIT, Michigan 48203

SE
DIVISION OFFICE

Attention: Mr. Larry AuBuchon

Gentlemen:

We have corrected or have taken steps to correct the violations noted in your letter of February 2, 1983.

1. We have updated the records of people involved in handling our waste and will re-train these people within the next 60 days as to proper procedures.
2. Our operating records are being more accurately kept and inventory is being controlled. The record is being kept in the Boiler Room as suggested.

Very truly yours,

REICHOLD CHEMICALS, INC.

J. A. Broderick
J. A. Broderick
Plant Manager

JAB/bjh

REICHHOLD®

MID 020087128

CORPORATE HEADQUARTERS: 525 NORTH BROADWAY, WHITE PLAINS, NEW YORK 10603

TELEPHONE: (914) 682-5700

TWX: 7105681373

CABLE: BECKACITE WHITE PLAINS

Address Reply To
601-707 WOODWARD HEIGHTS BLVD.
DETROIT, MICHIGAN 48220

(313) 564-6500

March 2, 1984

State of Michigan
Department of Natural Resources
Hazardous Waste Division
1120 W. State Fair Ave.
DETROIT, Michigan 48203

RECEIVED
MAR 5 1984

Attention: Laura L. Lodisio

Gentlemen:

The following is a list of changes we are making to correct the violations you found at our location during your RCRA inspection February 1, 1984:

1. The daily inspection report of our dyked hazardous waste site includes the inspector's name, date and time of inspection, and what was found during the inspection. Basically we are looking for leaks. As the records indicate, if a leak is found, it is properly handled - the date and action taken is noted. A letter of directives will be attached to the record book of inspections advising personnel to look for leaking drums and deterioration of the dyke. This is in addition to the instructions in the "Personnel Training Book".
2. The "Hazardous Waste Training Manual" will be changed to include the job titles, etc. before the next training session.
3. The existing isle space between the rows of drums has been functional for our personnel but the space will be widened.
4. All the containers that were near the east wall have been removed. Some of these drums were empty or contained solids in the bottom of them.
5. Copies of the contingency plan will be sent to the local emergency response teams with a letter requesting their signature of approval and return to us.
6. During the revisions of the "Hazardous Waste Training Manual", the evacuation plan will be clarified.

March 2, 1984

7. If the tank is reused, a daily inventory and inspection will be conducted.
8. The closure plan will be rewritten to include the maximum number of drums that can be stored in relation to the closure costs.
9. The closed storage tank will not be used to store ignitable hazardous waste until it is approved by your office.

If you have any questions on the above, please advise.

Very truly yours,

REICHOLD CHEMICALS, INC.



John A. Yonke
Loss Control Manager

JAY/bjh

cc: J. A. Broderick, RCI

STATE OF MICHIGAN



JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

STEVENS T. MASON BUILDING
BOX 30028
LANSING, MI 48909

RONALD O. SKOOG, Director

February 6, 1984

Hazardous Waste Div.
1120 W. State Fair Ave.
Detroit, MI 48203
(313) 368-3335

NATURAL RESOURCES COMMISSION
THOMAS J. ANDERSON
R. CAROLLO
ACOB A. HOEFER
STEPHEN F. MONSMA
HILARY F. SNELL
PAUL H. WINDLETT
DAVID H. WHITELEY

Reichhold Chemicals, Inc.
601 Woodward Heights
Ferndale, MI 48220

U.S. EPA I.D. No. MID 020087128

Attention: John A. Broderick, Plant Manager
John A. Yonke, Plant Engineer

Gentlemen:

On February 1, 1984, acting as a representative of the United States Environmental Protection Agency, I performed an inspection at your facility located at 601 Woodward Heights, Ferndale, Michigan to evaluate compliance of that facility with the requirement of subtitle C of the Resource Conservation and Recovery Act (RCRA) as amended.

As a result of that inspection, it has been determined that the above facility is in violation of the requirements of subtitle C of RCRA. Specifically, the following was found:

1. The facility inspection schedule does not identify types of problems to look for, specific areas to be addressed, etc. during inspections and the date of and explanation of remedial actions and/or repairs as required per 40 CFR 265.15. Daily inspection frequency is adequate.
2. Personnel training records do not include the required documents and records as required per 40 CFR 265.16(d)(1)(2)(3). These include job titles for each position, written job description for each position, written description of both type and amount of introductory and continuing training.
3. The owner or operator has not maintained aisle space within the storage area to allow the unobstructed movement of personnel, fire protection equipment, spill control and decontamination equipment in an emergency as required per 40 CFR 265.35.
4. Containers holding ignitable waste are not located at least 15 meters (50 feet) from the facility's property line as required per 40 CFR 265.176. (Specifically, containers with hazardous waste are being stored near the north wall bordering the property line.)

Reichhold Chemicals, Inc.
February 6, 1984
Page 2

5. The facility contingency plan does not describe arrangements agreed to by local police departments, fire departments, hospitals, contractors and other local emergency response teams that may be called upon to provide emergency service as per 40 CFR 265.52(c). Also, as required per 40 CFR 265.53 each agency should be supplied with a copy of the contingency plan.
6. The evacuation plan included in your contingency plan is not adequate as required per 40 CFR 265.52(f).
7. Though it was indicated that the tank in which you store hazardous waste has not been used for that purpose in the past year, there has never been an accurate inventory kept of this waste. When the use of this tank is resumed, it will be necessary that an accurate inventory be maintained in your operating log as per 40 CFR 265.73(a)(1)(2).
8. The facility closure plan does not include the minimum requirements as specified in 40 CFR 265.112(a)(1)(2)(3)(4).
9. The covered tank which is used to store ignitable waste does not comply with the buffer zone requirements for tanks contained in the National Fire Protection Association's "Flammable and Combustible Liquids Code" as required per 40 CFR 265.198(b).

As per our discussion regarding this tank, there was some question as to whether the waste being stored would be exempt from regulation under RCRA as per 40 CFR 261.6 for hazardous wastes which are used, re-used, recycled or reclaimed. As specified in 40 CFR 261.6(b) wastes which are listed in 261.31 or 261.32 or contains one or more of those listed wastes that are transported or stored prior to being used, re-used, recycled or reclaimed are subject to all applicable regulations with respect to such transportation or storage. Since, it appears that the waste which is stored in the tank is listed and is stored prior to reclamation and/or re-use, it is subject to those requirements.

Second, this tank was not included in your original Part A permit application but was identified in the revised Part A application submitted on July 8, 1983. As per 40 CFR 270.72, it is necessary for all revisions submitted to comply with the interim status standards of 40 CFR Part 265.

You are requested to respond to this letter by March 5, 1984 providing documentation to this office regarding those actions taken to correct these violations. Please send your response to the address in the upper right corner of this letter.

If you have any questions regarding this matter, please feel free to contact me at (313) 368-3335.

Sincerely,



Laura L. Lodisio
DETROIT DISTRICT OFFICE

cc: J. Bohunsky
K. Burda
EPA

RCRA Inspection Report

EPA Identification Number: M I D 0 2 0 0 8 7 1 2 8

Installation Name: REICHOLO CHEMICAL, INC.

Location Address: 601 WOODWARD HEIGHTS BLVD.

City: FERNDALE State: MICH.

Date of inspection: 02/01/84 Time of inspection (from) 10:00 (to) 12:30

Person(s) interviewed

Title

Telephone

JOHN YONKE

Plant Engineer
and Safety Director.

542-0200 (ext 315)

Inspector(s)

Agency/Title

Telephone

LAURA LODISIO

MONR-RESOURCE SPEC.

(313) 368-3335

MARWAN KHURI

MONR-ENVIR. ENGINEER

(313) 666-2700

Installation Activity (mark only one box)

Inspection Form(s)

☒ Treatment/Storage/Disposal per 40 CFR 265.1 and/or
Generation and/or Transportation

A

☐ Treatment/Storage/Disposal (no generation or Transportation)

A

☐ Generation and Transportation

B, C

☐ Generation only

B

☐ Transportation only

C

INSPECTION FORM A

Section A: SCOPE OF INSPECTION.

1. Interim status standards for treatment storage or disposal of HAZARDOUS WASTES SUBJECT TO 40 CFR 265.1. Complete Inspection Form A sections B, C, D, E, and G.
2. Place an "X" in the box(es) corresponding to the facility's treatment, storage and disposal processes, and generation and/or transportation activity (if any). Complete only the applicable sections and appendixes.

Permit application process(es) (EPA Form 3510-3) Inspection Form A section(s)

S01	<input checked="" type="checkbox"/>	storage in containers	I
S02	<input checked="" type="checkbox"/>	storage in tanks	J
T01	<input type="checkbox"/>	treatment in tanks	J
S04	<input type="checkbox"/>	storage in surface impoundment	K,F
T02	<input type="checkbox"/>	treatment in surface impoundment	K,F
D83	<input type="checkbox"/>	disposal in surface impoundment	K,F
S03	<input type="checkbox"/>	storage in waste pile	L
D81	<input type="checkbox"/>	disposal by land application	M,F
D80	<input type="checkbox"/>	disposal in landfill	N,F
T03	<input type="checkbox"/>	treatment by incineration	O/P
T04	<input type="checkbox"/>	treatment in devices other than tanks, surface impoundments, or incinerators	Q

Other activities

GENERATOR	<input checked="" type="checkbox"/>	APPENDIX	GN
TRANSPORTER	<input type="checkbox"/>	APPENDIX	TR

3. Indicate any hazardous waste processes, by process code, which have been omitted from Part A of the facility's permit application.

T04

4. Indicate any hazardous waste processes (by process code and line number on EPA Form 3510-3 page 1 of 5) which appear to be eligible for exclusion per 40 CFR 265.1(c). Provide a brief rationale for the possible exclusion.

Submitted revised Part A 7-8-83 to eliminate this process as per 261.6. Not incineration; but re-use as a boiler fuel.

Section B: GENERAL FACILITY STANDARDS: (Part 265 Subpart B)

	YES	NO	NI*	Remarks
1. Has the Regional Administrator been notified regarding: 265.12				
a. Receipt of hazardous waste from a foreign source?	—	✓	—	<u>No receipt of waste from off-site.</u>
b. Facility expansion?	—	✓	—	<u>No facility expansion.</u>
c. Change of owner or operator?	—	✓	—	<u>No chg. of ownership</u>
2. General Waste Analysis: 265.13				
a. Has the owner or operator obtained a detailed chemical and physical analysis of the waste?	—	✓	—	<u>Waste analysis is determined by knowledge of mfg. process & raw materials used therein. Batch analysis kept on ea. batch.</u>
b. Does the owner or operator have a detailed waste analysis plan on file at the facility?	—	✓	—	
c. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?	—	—	—	<u>No movement of Haz. Wastes from off-site.</u>
3. Security - Do security measures include: (if applicable) 265.14				
a. 24-Hour surveillance?	✓	—	—	
or				
b. i. Artificial or natural barrier around facility?	✓	—	—	<u>Fence</u>
and				
ii. Controlled entry?	✓	—	—	
c. Danger sign(s) at entrance?	✓	—	—	
4. Owner or operator inspections: 265.15				
a. Does the owner or operator inspect the facility for malfunctions, deterioration, operator errors, and discharges of hazardous waste that may affect human health or the environment?	✓	—	—	

*Not Inspected

→ Batch Sample of Oil/Waste^B mixture is taken from 4182-A fuel tap prior to boiler & sent to ERG for analysis every 20 days. This treatment is not regulated per RCRA/261.6

YES NO NI Remarks

b. Does the owner or operator have an inspection schedule at the facility?

☒ As part of inventory log.

c. If so, does the schedule address the inspection of the following items:

i. monitoring equipment?

☒ N.A.
abt in house - outside contract.

ii. safety and emergency equipment?

☒ this was indicated to be done by security daily & kept in separate log.

iii. security devices?

iv. operating and structural equipment (i.e. dikes, pumps, etc.)?

☒ Not specified

v. type of problems to be looked for during the inspection (e.g. leaky fitting, defective pump, etc.)?

☒ Not specified

vi. inspection frequency (based upon the possible deterioration rate of the equipment)?

Daily.

d. Are areas subject to spills inspected daily when in use?

☒

e. Does the owner or operator maintain an inspection log or summary of owner or operator inspections?

☒

f. Does the inspection log contain the following information:

i. the date and time of the inspection?

☒ No time

ii. the name of the inspector?

☒ J. Yonke.

iii. a notation of the observations made?

☒

iv. the date and nature of any repairs or remedial actions?

☒

5. Do personnel training records include: 265.16

a. Job titles?

☒

b. Job descriptions?

☒

	YES	NO	NI	Remarks
c. Description of training?	—	✓	—	—
d. Records of training?	✓	—	—	<u>Employee sign-up sheet</u>
e. Did facility personnel receive the required training by 5-19-81?	—	—	—	<u>Have been none.</u>
f. Do new personnel receive required training within six months?	✓	—	—	—
g. Do personnel training records indicate that personnel have taken part in an annual review of initial training?	—	—	—	<u>Training Sessions held July & Sept. 1983.</u>
6. If required, are the following special requirements for ignitable, reactive, or incompatible wastes addressed? 265.17	—	—	—	—
a. Special handling?	✓	—	—	<u>Explosion proof area for drum containers.</u>
b. No smoking signs?	—	—	—	<u>No smoking allowed on plant site except designated areas.</u>
c. Separation and protection from ignition sources?	✓	—	—	—

Section C: PREPAREDNESS AND PREVENTION: (Part 265 Subpart C)

1. Maintenance and Operation
of Facility: 265.31

YES NO NI Remarks

Is there any evidence of fire,
explosion, or release of
hazardous waste or hazardous
waste constituent?

— — —

*Had a fire of their
haz. waste / fuel mixture
on Jan. 15, 1982.
Kept an incident
report.*

2. If required, does the facility
have the following equipment: 265.32

a. Internal communications or
alarm systems?

☒ — —

b. Telephone or 2-way radios
at the scene of operations?

☒ — —

phones, P.A., two-ways.

c. Portable fire extinguishers,
fire control, spill control
equipment and decontamination
equipment?

☒ — —

*spinklers, portable
fire extinguishers.*

Indicate the volume of water and/or foam available for fire control:

8" city water main

3. Testing and Maintenance of
Emergency Equipment: 265.33

a. Has the owner or operator
established testing and
maintenance procedures
for emergency equipment?

☒ — —

*Done by outside
contractors.*

b. Is emergency equipment
maintained in operable
condition?

☒ — —

Also pull alarms.

4. Has owner or operator provided
immediate access to internal
alarms? (if needed) 265.34

☒ — —

*Through tele. sys;
two-ways, P.A.*

5. Is there adequate aisle space
for unobstructed movement?

— ☒ —

*Some of the aisles
are not adequate*

6. Has the owner or operator attempted
to make arrangements with local
authorities in case of an emergency
at the facility?

☒ — —

*Have made arrange-
ments but not
documented. Fire
Dept. comes on-site
1ce/yr. for training*

Section D: CONTINGENCY PLAN AND EMERGENCY PROCEDURES: (Part 265 Subpart D)

YES NO NI Remarks

1. Does the Contingency Plan contain the following information: 265.52

a. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Counter-measures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.)

✓

b. Arrangements agreed by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?

✓

Not documented.

c. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?

✓

No addresses.

d. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?

✓

e. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)

—

Needs to be made more explicit. General instructions only.

2. Are copies of the Contingency Plan available at the site and local emergency organizations? 265.53

✓

	YES	NO	NI	Remarks
3. Emergency Coordinator 265.55				
a. Is the facility Emergency Coordinator identified?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b. Is coordinator familiar with all aspects of site operation and emergency procedures?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. Emergency Procedures 265.56				
If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?				N.A.

Section E: MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING: (Part 265 Subpart E)

	YES	NO	NI	Remarks
** 1. Use of Manifest System 265.71				
a. Does the facility follow the procedures listed in §265.71 for processing each manifest? (Particularly sending a copy of the signed manifest back to the generator within 30 days after delivery.)	—	—	—	<u>No off-site waste</u>
b. Are records of past shipments retained for 3 years?	—	—	—	↓
** 2. Does the owner or operator meet requirements regarding manifest discrepancies? 265.72	—	—	—	↓
** Not applicable to owners or operators of on-site facilities that do not receive any waste from off-site sources.				
3. Operating Record 265.73				
a. Does the owner or operator maintain an operating record as required in 265.73?	✓	—	—	
b. Does the operating record contain the following information:				
i. The method(s) and date(s) of each waste's treatment, storage, or disposal as required in 40 CFR Part 265 Appendix I?	—	—	—	- Log dated. Daily entries. No treatment. No manifests (all on-site waste).
ii. The location and quantity of each hazardous waste within the facility? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)	—	—	—	Co. keeps a log of drummed waste - daily count. Waste divided in categories - - waste to be shipped - burnable waste etc. and kept in specific areas of storage area. (diked.)
***iii. A map or diagram of each cell or disposal area				
*** only applies to disposal facilities				
No inventory on tank storage, however has not been used				

YES NO NI Remarks

showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)

N.A.

iv. Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?

✓

Inspections shown.
no analysis are done.

v. Reports detailing all incidents that required implementation of the Contingency Plan?

✓

Co. indicates there have been none.

vi. All closure and post closure costs as applicable?

✓

Closure plan needs to be expanded.

4. Availability of Records 265.74

Are all facility records required under 40 CFR Part 265 available for inspection?

✓

What there are of them.

5.**Unmanifested Waste Reports 265.76

a. Has the facility accepted any hazardous waste from an off-site generator subject to 40 CFR 262.20 without a manifest or or shipping paper?

N.A.

b. If "a" is yes, provide the identity of the source of the waste and a description of the quantity, type, and date received for each unmanifested hazardous waste shipment.

no off-site wastes.

** Not applicable to owners or operators of on-site facilities that do not receive any hazardous from off-site sources.

Section G - CLOSURE AND POST CLOSURE (Part 265 Subpart G)

YES NO NI Remarks

1. Closure 265.112

a. Is the facility closure plan available for inspection?

✓

- estimate \$18,000.00 for closure costs.

b. Does the plan identify:

i. maximum extent unclosed during facility life?

 ✓

ii. maximum hazardous waste inventory?

 ✓

iv. estimated year of closure?

N.A. - Not estimated.

v. schedule of closure activities?

 ✓

c. Has closure begun?

 ✓

*2. Post-Closure 265.118

a. Is the post-closure plan available for inspection?

No Post Closure

plan required.

b. Does this plan contain:

i. description of groundwater monitoring activities and frequencies?

N.A.

ii. description of maintenance activities and frequencies for

AA. integrity of cap, final cover, or containment structures, where applicable

BB. facility monitoring equipment

iii. name, address, and phone number of person or office to contact during post-closure care period?

c. Has the post-closure period begun?

d. Is the written post-closure cost estimate available? 265.144

plies only to disposal facilities.

Section I - USE AND MANGEMENT OF CONTAINERS (Part 265, Subpart I)

	YES	NO	NI	Remarks
1. Are containers in good condition? 265.171	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Are containers compatible with waste in them? 265.172	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<i>No incompatible wastes.</i>
3. Are containers managed to prevent leaks? 265.173	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. Are containers stored closed?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5. Are containers inspected weekly for leaks and defects.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. Are ignitable and reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive). 265.176	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<i>Stg. area is but drums waiting classification are not.</i>
7. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply). 265.177	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<i>N.A.</i>
8. Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<i>N.A.</i>

Section J - TANKS (Part 265, Subpart J)

YES NO NA. Remarks

1. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank? 265.192 ✓
2. Do uncovered tanks have at least 60 cm (2 feet) of free-board, or dikes or other containment structures? ✓ Covered tank w/ dikes.
3. Do continuous feed systems have a waste-feed cutoff? ✓ No continuous feed.
4. Are waste analyses done before the tanks are used to store a substantially different waste than before? 265.193 Batch only.
Always same waste.
5. Are required daily and weekly inspections done? 265.194 Indicate so; but not specific in inspection report.
6. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? 265.198 - Protected from ignition sources; ✓
7. Are incompatible wastes stored in separate tanks? 265.199 (If not, the provisions of 40 CFR 265.17(b) apply.) No incompatible wastes.
8. Has the owner or operator observed the National Fire Protection Associations buffer zone requirements for tanks containing ignitable or reactive wastes?

Tank capacity: 8000 gallons

Tank diameter: 10 feet

Distance of tank from property line 25 feet

(See table 2 - 1 through 2 - 6 of NFPA's "Flammable and Combustible Liquids Code - 1977" to determine compliance.)

J-1

4/82-A

✓
This Storage tank was not in orig. Part A.
However it was added to Revised Part A
Submitted on July 8, 1983.

Section A: Scope

1. Complete this Appendix if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

Section B: MANIFEST REQUIREMENTS (Part 262, Subpart B)

	YES	NO	NI	Remarks
(1) Does the operator have copies of the manifest available for review? 262.40	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(2) Examine manifests for shipments in past 6 months. Indicate approximate number of manifested shipments during that period.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<i>~ 25 for last year.</i>
(3) Do the manifest forms examined contain the following information: (If possible, make copies of, or record information from, manifest(s) that do not contain the critical elements). 262.21				<i>Waste to</i>
a. Manifest document number?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<i>Gold Shield</i>
b. Name, mailing address, telephone number, and EPA ID number of Generator	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<i>Retro-Chem.</i>
c. Name and EPA ID Number of Transporter(s)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<i>Wayne Disp.</i>
d. Name, address, and EPA ID Number Designated permitted facility and alternate facility?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<i>Tricil</i>
e. The description of the waste(s) (DOT shipping name, DDT hazard class, DOT identification number)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<i>Great Lakes Environ.</i>
f. The total quantity of waste(s) and the type and number of containers loaded?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<i>(or Tricil)</i>
g. Required certification?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
h. Required signatures?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(4) Reportable exceptions 262.42				
a. For manifests examined in (2) (except for shipments within the last 35 days), enter the number of manifests for which the generator has <u>NOT</u> received a signed copy from the designated facility within 35 days of the date of shipment.				<i>NONE</i>
b. For manifests indicated in (4a), enter the number for which the generator has submitted exception reports (40 CFR 262.42) to the Regional Administrator.				

Section C: PRE-TRANSPORT REQUIREMENTS (Part 262, Subpart C)

	YES	NO	NI	Remarks
1. Is waste packaged in accordance with DDT regulations? (Required prior to movement of hazardous waste off-site) 262.30	—	—	—	—
2. Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required for movement of hazardous waste off-site) 262.31 262.32	—	—	—	—
3. If required, are placards available to transporters of hazardous waste? 262.33	—	—	—	—
4. On-site accumulation of generated hazardous wastes. A HWMF may accumulate hazardous waste it generates either (A) in its storage facility [265.1(b)] or (B) in accordance with 40 CFR 262.34 [see 265.1(c)(7)]. Option B restricts all accumulation to tanks and containers. If the installation elects option A, check this box <input checked="" type="checkbox"/> and skip to Section D. If the installation elects option B, complete the following observations: See 40 CFR 262.34 January 11, 1982 Revision				
a. Is each container clearly marked with the start of accumulation date?	—	—	—	—
b. Have more than 90 days elapsed since the date inspected in (a)?	—	—	—	—
c. Do wastes remain in accumulation tanks for more than 90 days?	—	—	—	—
d. Is each container and tank labeled or marked clearly with the words "Hazardous Waste"?	—	—	—	—

Section D: - RECORDKEEPING AND REPORTING (Part 262, Subpart D)

	YES	NO	NI	Remarks
1. Are all test results and analyses needed for hazardous waste determinations retained for at least three years? 262.40	—	—	—	No tests or analysis.

Section E: - INTERNATIONAL SHIPMENTS (Part 262, Subpart E)

1. Has the installation imported or exported Hazardous Waste? 262.50	✓	—	—	—
(If answered Yes, complete the following as applicable.)				
a. Exporting Hazardous waste; has a generator:				

	YES	NO	NI	Remarks
i. Notified the Administrator in writing?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Notification sent every April.
ii. Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
iii. Met the Manifest requirements?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b. Importing Hazardous Waste; has the generator met the manifest requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	N.A. not importing haz. wastes.



NATURAL RESOURCES COMMISSION

JACOB A. HOEFER
E. M. LAITALA
HILARY F. SNELL
PAUL H. WENDLER
HARRY H. WHITELEY

James J. Blanchard, Governor

DEPARTMENT OF NATURAL RESOURCES

STEVENS T. MASON BUILDING
BOX 30028
LANSING, MI 48909
HOWARD A. TANNER, Director

Hazardous Waste Division
Detroit District Office
1120 W. State Fair Ave
Detroit, MI 48203
(313) 368-3335

1374

February 2, 1983

John Broderick, Plant Manager
Reichhold Chemicals, Inc.
601 Woodward Hts. Blvd.
Ferndale, MI 48220

EPA ID No.: MID 020087138

Dear Mr. Broderick:

On January 18, 1983, I conducted an inspection of your facility located at 601 Woodward Hts. Blvd., Ferndale, MI to evaluate compliance of that facility with the requirements of subtitle C of the Resource Conservation and Recovery Act (RCRA) as amended.

As a result of that inspection, it has been determined that the above facility is in violation of the requirements of subtitle C of RCRA. Specifically, the following was found:

1. The personnel training records need to be expanded to include all personnel handling the generated hazardous wastes as required in 40 CFR 265.16.
2. The operating record must be kept in accordance with 40 CFR 265.73.

You are requested to respond to this letter by March 2, 1983 providing documentation to this office regarding those actions taken to correct these violations. Please address your response to the address in the upper right corner of this letter.

If you have any questions regarding this matter, please feel free to contact me at (313) 368-3335.

Sincerely,
HAZARDOUS WASTE DIVISION

Larry AuBuchon
DETROIT DISTRICT OFFICE

LA:pf
Enclosure
cc: C. Riley, HWD
EPA

#1374

RCRA Inspection Report

PA Identification Number: MI 0 0 2 0 0 8 7 1 2 8Installation Name: Reichhold Chemicals Inc.Location Address: 601 Woodward Hts Blvd.City: FerndaleState: MI 48220Date of inspection: 1/9/83Time of inspection (from) 1330 (to) 1600

Person(s) interviewed

Title

Telephone

John BroderickPlant Manager(313) 564-6500John YankeEngineer(313) 564-6500

Inspector(s)

Agency/Title

Telephone

Larry AuBuchonMDNR/HWD/Water Quality Spec.(313) 3683335Installation Activity (mark only one box)Inspection Form(s)☒ Treatment/Storage/Disposal per 40 CFR 265.1 and ~~Generation and/or Transportation~~

A

☐ Treatment/Storage/Disposal (no generation or Transportation)

A

☐ Generation and Transportation

B, C

☐ Generation only

B

☐ Transportation only

C

INSPECTION FORM A

Section A: SCOPE OF INSPECTION.

1. Interim status standards for treatment storage or disposal of HAZARDOUS WASTES SUBJECT TO 40 CFR 265.1. Complete Inspection Form A sections B, C, D, E, and G.
2. Place an "X" in the box(es) corresponding to the facility's treatment, storage and disposal processes, and generation and/or transportation activity (if any). Complete only the applicable sections and appendixes.

<u>Permit application process(es) (EPA Form 3510-3)</u>	<u>Inspection Form A section(s)</u>
---	-------------------------------------

S01 <input checked="" type="checkbox"/> storage in containers	I
S02 <input checked="" type="checkbox"/> storage in tanks	J
T01 <input type="checkbox"/> treatment in tanks	J
S04 <input type="checkbox"/> storage in surface impoundment	K,F
T02 <input type="checkbox"/> treatment in surface impoundment	K,F
D83 <input type="checkbox"/> disposal in surface impoundment	K,F
S03 <input type="checkbox"/> storage in waste pile	L
D81 <input type="checkbox"/> disposal by land application	M,F
D80 <input type="checkbox"/> disposal in landfill	N,F
T03 <input checked="" type="checkbox"/> treatment by incineration	O/P
T04 <input type="checkbox"/> treatment in devices other than tanks, surface impoundments, or incinerators.	Q

Other activities

GENERATOR <input checked="" type="checkbox"/>	APPENDIX GN
TRANSPORTER <input type="checkbox"/>	APPENDIX TR

3. Indicate any hazardous waste processes, by process code, which have been omitted from Part A of the facility's permit application.
4. Indicate any hazardous waste processes (by process code and line number on EPA Form 3510-3 page 1 of 5) which appear to be eligible for exclusion per 40 CFR 265.1(c). Provide a brief rationale for the possible exclusion.

Section B: GENERAL FACILITY STANDARDS: (Part 265 Subpart B)

YES NO NI* Remarks

1. Has the Regional Administrator been notified regarding: 265.12

a. Receipt of hazardous waste from a foreign source?

X — —

No Receipt

b. Facility expansion?

X — —

No Expansion

c. Change of owner or operator?

X — —

No Change

2. General Waste Analysis: 265.13

a. Has the owner or operator obtained a detailed chemical and physical analysis of the waste?

X — —

b. Does the owner or operator have a detailed waste analysis plan on file at the facility?

X — —

c. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?

N/A — —

waste is generated on-site

3. Security - Do security measures include: (if applicable) 265.14

a. 24-Hour surveillance?
or

✓ — —

b. i. Artificial or natural barrier around facility?
and

✓ — —

ii. Controlled entry?

✓ — —

c. Danger sign(s) at entrance?

✓ — —

4. Owner or operator inspections: 265.15

a. Does the owner or operator inspect the facility for malfunctions, deterioration, operator errors, and discharges of hazardous waste that may affect human health or the environment?

✓ — —

*Not Inspected

	YES	NO	NI	Remarks
b. Does the owner or operator have an inspection schedule at the facility?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>weekly</u>
c. If so, does the schedule address the inspection of the following items:				
i. monitoring equipment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>N/A</u>
ii. safety and emergency equipment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
iii. security devices?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
iv. operating and structural equipment (i.e. dikes, pumps, etc.)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
v. type of problems to be looked for during the inspection (e.g. leaky fitting, defective pump, etc.)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
vi. inspection frequency (based upon the possible deterioration rate of the equipment)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>weekly log</u>
d. Are areas subject to spills inspected daily when in use?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
e. Does the owner or operator maintain an inspection log or summary of owner or operator inspections?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
f. Does the inspection log contain the following information:				
i. the date and time of the inspection?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>ensure all info is recorded.</u>
ii. the name of the inspector?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
iii. a notation of the observations made?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
iv. the date and nature of any repairs or remedial actions?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5. Do personnel training records include: 265.16				
a. Job titles?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>expand to all HW personnel</u>
b. Job descriptions?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

	YES	NO	NI	Remarks
c. Description of training?	<u>X</u>	<u> </u>	<u> </u>	<u>only on some personnel</u>
d. Records of training?	<u> </u>	<u>X</u>	<u> </u>	<u> </u>
e. Did facility personnel receive the required training by 5-19-81?	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
f. Do new personnel receive required training within six months?	<u>X</u>	<u> </u>	<u> </u>	<u>No new personnel</u>
g. Do personnel training records indicate that personnel have taken part in an annual review of initial training?	<u> </u>	<u>X</u>	<u> </u>	<u> </u>
6. If required, are the following special requirements for ignitable, reactive, or incompatible wastes addressed? 265.17				
a. Special handling?	<u>✓</u>	<u> </u>	<u> </u>	<u> </u>
b. No smoking signs?	<u>✓</u>	<u> </u>	<u> </u>	<u>Smoking prohibited on plant site. Only at designated area</u>
c. Separation and protection from ignition sources?	<u>✓</u>	<u> </u>	<u> </u>	<u>Block walls</u>

Section C: PREPAREDNESS AND PREVENTION: (Part 265 Subpart C)

1. Maintenance and Operation
of Facility: 265.31

Is there any evidence of fire,
explosion, or release of
hazardous waste or hazardous
waste constituent?

YES NO NI Remarks

_____ ✓ _____ _____

2. If required, does the facility
have the following equipment: 265.32

a. Internal communications or
alarm systems?

_____ ✓ _____ _____

b. Telephone or 2-way radios
at the scene of operations?

_____ ✓ _____ _____

c. Portable fire extinguishers,
fire control, spill control
equipment and decontamination
equipment?

_____ ✓ _____ _____

Indicate the volume of water and/or foam available for fire control:

CO₂ / Dry Chemicals ; 8" line

3. Testing and Maintenance of
Emergency Equipment: 265.33

a. Has the owner or operator
established testing and
maintenance procedures
for emergency equipment?

_____ ✓ _____ _____

b. Is emergency equipment
maintained in operable
condition?

_____ ✓ _____ _____

4. Has owner or operator provided
immediate access to internal
alarms? (if needed) 265.34

_____ ✓ _____ _____

5. Is there adequate aisle space
for unobstructed movement?

_____ ✓ _____ _____

6. Has the owner or operator attempted
to make arrangements with local
authorities in case of an emergency
at the facility?

_____ ✓ _____ _____

Section D: CONTINGENCY PLAN AND EMERGENCY PROCEDURES: (Part 265 Subpart D)

YES NO NI Remarks

1. Does the Contingency Plan contain the following information: 265.52

a. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.)

✓

b. Arrangements agreed by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?

✓

add hospital (clinic)

c. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?

✓

d. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?

✓

e. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)

✓

2. Are copies of the Contingency Plan available at the site and local emergency organizations? 265.53

✓

*omit Police
include hospitals*

YES NO NI Remarks

3. Emergency Coordinator 265.55

a. Is the facility Emergency Coordinator identified?

✓

insure coordinator

b. Is coordinator familiar with all aspects of site operation and emergency procedures?

✓

List is updated.

c. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?

✓

4. Emergency Procedures 265.56

If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?

N/A

Section E: MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING: (Part 265 Subpart E)

YES	NO	NI	Remarks
-----	----	----	---------

** 1. Use of Manifest System 265.71

- a. Does the facility follow the procedures listed in §265.71 for processing each manifest? (Particularly sending a copy of the signed manifest back to the generator within 30 days after delivery.)



- b. Are records of past shipments retained for 3 years?

- ** 2. Does the owner or operator meet requirements regarding manifest discrepancies? 265.72

N/A

- ** Not applicable to owners or operators of on-site facilities that do not receive any waste from off-site sources.

3. Operating Record 265.73

- a. Does the owner or operator maintain an operating record as required in 265.73?

X X

- b. Does the operating record contain the following information:

- i. The method(s) and date(s) of each waste's treatment, storage, or disposal as required in 40 CFR Part 265 Appendix I?

X X

- ii. The location and quantity of each hazardous waste within the facility? (This information should be cross-referenced to specific manifest number, if waste was accompanied by by a manifest.)

Proteinase 3 **ADP-1** **ADP-2**

Only operating record is of incinerated waste

Operating record needs to be expanded to include waste - storage.

- ***iii. A map or diagram of each cell or disposal area

N/A

*** only applies to disposal facilities

E-1

4/82-A

YES NO NI Remarks

showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)

— — — N/A —

iv. Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?

X — — —

v. Reports detailing all incidents that required implementation of the Contingency Plan?

X — — — None occurred

vi. All closure and post closure costs as applicable?

X — — —

4. Availability of Records 265.74

Are all facility records required under 40 CFR Part 265 available for inspection?

X — — —

5.**Unmanifested Waste Reports 265.76

a. Has the facility accepted any hazardous waste from an off-site generator subject to 40 CFR 262.20 without a manifest or or shipping paper?

— — — N/A —

b. If "a" is yes, provide the identity of the source of the waste and a description of the quantity, type, and date received for each unmanifested hazardous waste shipment.

— — —
— — —
— — —

** Not applicable to owners or operators of on-site facilities that do not receive any hazardous from off-site sources.

Section G - CLOSURE AND POST CLOSURE (Part 265 Subpart G)

YES NO NI Remarks

1. Closure 265.112

a. Is the facility closure plan available for inspection?

☒ ☐ ☐

b. Does the plan identify:

i. maximum extent unclosed during facility life?

☒ ☐ ☐

ii. maximum hazardous waste inventory?

☒ ☐ ☐

iv. estimated year of closure?

☐ ☐ ☐

v. schedule of closure activities?

☒ ☐ ☐

c. Has closure begun?

☐ ☒ ☐

*see operating record
not determined as yet*

*2. Post-Closure 265.118

a. Is the post-closure plan available for inspection?

☐ ☐ ☐

N/A

b. Does this plan contain:

i. description of groundwater monitoring activities and frequencies?

☐ ☐ ☐

N/A

ii. description of maintenance activities and frequencies for

AA. integrity of cap, final cover, or containment structures, where applicable

☐ ☐ ☐

N/A

BB. facility monitoring equipment

☐ ☐ ☐

N/A

iii. name, address, and phone number of person or office to contact during post-closure care period?

☐ ☐ ☐

N/A

c. Has the post-closure period begun?

☐ ☐ ☐

N/A


d. Is the written post-closure cost estimate available? 265.144

☐ ☐ ☐

N/A

*Applies only to disposal facilities.

Section I - USE AND MANGEMENT OF CONTAINERS (Part 265, Subpart I)

	YES	NO	NI	Remarks
1. Are containers in good condition? 265.171	<u>X</u>	—	—	_____
2. Are containers compatible with waste in them? 265.172	<u>X</u>	—	—	_____
3. Are containers managed to prevent leaks? 265.173	<u>X</u>	—	—	_____
4. Are containers stored closed?	<u>X</u>	—	—	_____
5. Are containers inspected weekly for leaks and defects.	<u>X</u>	—	—	_____
6. Are ignitable and reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive). 265.176	<u>X</u>	<u>X</u>	—	
7. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply). 265.177	<u>X</u>	—	—	<u>No incompatible wastes</u>
8. Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?	<u>X</u>	—	—	_____

Section J - TANKS (Part 265, Subpart J)

YES NO NI Remarks

1. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank? 265.192 X — — _____

2. Do uncovered tanks have at least 60 cm (2 feet) of free-board, or dikes or other containment structures? X — — enclosed tanks with dikes

3. Do continuous feed systems have a waste-feed cutoff? — — — Not continuous feed

4. Are waste analyses done before the tanks are used to store a substantially different waste than before? 265.193 X — — same wastes in tanks

5. Are required daily and weekly inspections done? 265.194 X — — _____

6. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? 265.198
 Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.) — X — Ignitable

7. Are incompatible wastes stored in separate tanks? 265.199
 (If not, the provisions of 40 CFR 265.17(b) apply.) X — — No incompatible wastes

8. Has the owner or operator observed the National Fire Protection Associations buffer zone requirements for tanks containing ignitable or reactive wastes?

Tank capacity: 8000 gallons

Tank diameter: 10 feet

Distance of tank from property line 25 feet

(See table 2 - 1 through 2 - 6 of NFPA's "Flammable and Combustible Liquids Code - 1977" to determine compliance.)

463-2541

Section O/P - INCINERATION AND THERMAL TREATMENT (40 CFR Part 265, Subparts O and P)

Determination of Steady State

I=incinerator T=thermal

a. Type of unit (i.e., type of incinerator or thermal treatment): Incinerator
Modified Oil Fired Boiler

b. Components and steady state condition: I 265.343 T 265.373

Was each component at steady state prior to adding waste?

Component	YES	NO	NI	Remarks
<u>Temp</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>2000°F > 1600°F</u>
<u>O₂</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>excess O₂ 3%</u>
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

2. Waste Analysis I 265.345 T 265.375

a. Minimum requirements, for wastes not previously burned/treated.

i. Required analyses; has an analysis been performed for the following?

Heating value	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Halogen content	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<u>No Halogens</u>
Sulfur content	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<u>minimal sulfur in waste</u> <u>1% - oil</u>

ii. Has documented or written data been substituted for analysis of either:

Lead?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>every 20 days</u>
Mercury:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<u>not in inventory</u>

- b. List other parameters for which the waste is tested to enable owner or operator to establish steady state or determine the types of pollutants which may be emitted. (Note in Remarks any which you feel should be tested.)

	YES	NO	NI	Remarks
3. <u>Monitoring and Inspections</u> I 265.347 T 265.37				
a. Are combustion/emission control instruments monitored at least every 15 minutes?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b. Is steady state maintained or corrections attempted?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c. Is stack plume observed at least hourly for normal color and opacity?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d. Did any stack observations made by owner or operator show a plume different than normal?**	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
e. If "yes" to (d) above, were corrections made to return emissions to normal appearance?**	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	N/A
f. Are the complete unit and associated equipment inspected daily for leaks, spills, and fugitive emissions?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

**Specify in Remarks for what period of time this was checked.

g. Are emergency shutdown controls and system alarms checked daily for proper operation?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
--	-------------------------------------	--------------------------	--------------------------	--

4. Open Burning T 265.382 (open burning does not apply to incineration)

a. Only complete this part if the facility open burns hazardous waste.				
i. Does this facility burn <u>only</u> waste explosives? (A <u>No</u> answer means <u>other</u> hazardous waste is open-burned).	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	N/A

Section A: Scope

1. Complete this Appendix if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

Section B: MANIFEST REQUIREMENTS (Part 262, Subpart B)

	YES	NO	NI	Remarks
(1) Does the operator have copies of the manifest available for review? 262.40	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(2) Examine manifests for shipments in past 6 months. Indicate approximate number of manifested shipments during that period. <u>12</u>				
(3) Do the manifest forms examined contain the following information: (If possible, make copies of, or record information from, manifest(s) that do not contain the critical elements). 262.21				
a. Manifest document number?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b. Name, mailing address, telephone number, and EPA ID number of Generator	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c. Name and EPA ID Number of Transporter(s)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d. Name, address, and EPA ID Number Designated permitted facility and alternate facility?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
e. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
f. The total quantity of waste(s) and the type and number of containers loaded?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
g. Required certification?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
h. Required signatures?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(4) Reportable exceptions 262.42				
a. For manifests examined in (2) (except for shipments within the last 35 days), enter the number of manifests for which the generator has <u>NOT</u> received a signed copy from the designated facility within 35 days of the date of shipment. <u>0</u>				
b. For manifests indicated in (4a), enter the number for which the generator has submitted exception reports (40 CFR 262.42) to the Regional Administrator. <u>0</u>				

Section C: PRE-TRANSPORT REQUIREMENTS (Part 262, Subpart C)

	YES	NO	NI	Remarks
1. Is waste packaged in accordance with DOT regulations? (Required prior to movement of hazardous waste off-site) 262.30	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required for movement of hazardous waste off-site) 262.31 262.32	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. If required, are placards available to transporters of hazardous waste? 262.33	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. On-site accumulation of generated hazardous wastes. A HWMF may accumulate hazardous waste it generates either (A) in its storage facility [265.1(b)] or (B) in accordance with 40 CFR 262.34 [see 265.1(c)(7)]. Option B restricts all accumulation to tanks and containers. If the installation elects option A, check this box <input checked="" type="checkbox"/> and skip to Section D. If the installation elects option B, complete the following observations: See 40 CFR 262.34 January 11, 1982 Revision				
a. Is each container clearly marked with the start of accumulation date?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b. Have more than 90 days elapsed since the date inspected in (a)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c. Do wastes remain in accumulation tanks for more than 90 days?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d. Is each container and tank labeled or marked clearly with the words "Hazardous Waste"?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Section D: - RECORDKEEPING AND REPORTING (Part 262, Subpart D)

	YES	NO	NI	Remarks
1. Are all test results and analyses needed for hazardous waste determinations retained for at least three years? 262.40	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Section E: - INTERNATIONAL SHIPMENTS (Part 262, Subpart E)

1. Has the installation imported or exported Hazardous Waste? 262.50	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
(If answered Yes, complete the following as applicable.)				
a. Exporting Hazardous waste; has a generator:				



NATURAL RESOURCES COMMISSION

JACOB A. HOEFER
E. M. LAITALA
HILARY F. SNELL
PAUL H. WENDLER
HARRY H. WHITELEY
JOAN L. WOLFE
CHARLES G. YOUNGLOVE

WILLIAM G. MILLIKEN, Governor

DEPARTMENT OF NATURAL RESOURCES

HOWARD A. TANNER, Director

2455 N. Williams Lake Road
Pontiac, Michigan 48054

August 25, 1982

RECEIVED

SEP 3 1982

WASTE MANAGEMENT BRANCH
EPA REGION V

Reichhold Chemical Company
601 Woodward Heights Boulevard
Ferndale, Michigan 48220

Attention: Mr. Fred Trumpy

Gentlemen:

On August 16, 1982 staff of the Department of Natural Resources conducted an investigation of your facility located at 601 Woodward Heights Boulevard in Ferndale, Michigan to evaluate compliance of that facility with requirements of subtitle C of the Resource Conservation and Recovery Act (RCRA) as amended.

As a result of that investigation, staff of the Department of Natural Resources have determined that the above facility is in violation of the requirements of subtitle C of RCRA. Specifically, staff found that:

1. Reichhold does not comply with the required 50 foot set-back from the facility property line for the storage of their waste resins as stipulated in 40 CFR 265.176.

We request that you respond to this letter by September 20, 1982 providing documentation to this office regarding those actions taken to correct these violations.

If you have any questions regarding this matter, please feel free to contact me at (313) 666-2700.

Sincerely,

David G. Hanson
Resource Specialist
Michigan Department of Natural Resources

DGH:mh

cc: Al Howard, OHMM

RECEIVED

AUG 27 1982

ACT 64

RCRA Inspection Report

#799

EPA Identification Number: M I D 0 2 0 0 8 7 1 2 8

Installation Name: REICHOLD CHEMICALS

Location Address: 601 WOODWARD HTS BLVD.

City: FERNDALE State: MICHIGAN

Date of inspection: 8-10-82 Time of inspection (from) 1:00P (to) _____

Person(s) interviewed	Title	Telephone
<u>MR. Trumpy</u>	<u>PLT. Mgr.</u>	_____
<u>John Gjonke</u>	<u>PLT Eng'g</u>	_____
<u>MARK LEVENS</u>	<u>PLT Eng'g</u>	_____

Inspector(s)	Agency/Title	Telephone
<u>DAVID HANSON</u>	<u>MICH. AIR QUALITY DIV.</u>	<u>(313) 666-2700</u>

Installation Activity (mark only one box) Inspection Form(s)

- ☒ Treatment/Storage/Disposal per 40 CFR 265.1 and/or Generation and/or Transportation A
- ☐ Treatment/Storage/Disposal (no generation or Transportation) A
- ☐ Generation and Transportation B, C
- ☐ Generation only B
- ☐ Transportation only C

INSPECTION FORM A

Section A: SCOPE OF INSPECTION.

- ✓ 1. Interim status standards for treatment storage or disposal of HAZARDOUS WASTES SUBJECT TO 40 CFR 265.1. Complete Inspection Form A sections B, C, D, E, and G.
2. Place an "X" in the box(es) corresponding to the facility's treatment, storage and disposal processes, and generation and/or transportation activity (if any). Complete only the applicable sections and appendixes.

Permit application process(es) (EPA Form 3510-3) Inspection Form A section(s)

--S01	<input checked="" type="checkbox"/>	storage in containers	I
S02	<input type="checkbox"/>	storage in tanks	J
T01	<input type="checkbox"/>	treatment in tanks	J
S04	<input type="checkbox"/>	storage in surface impoundment	K,F
T02	<input type="checkbox"/>	treatment in surface impoundment	K,F
D83	<input type="checkbox"/>	disposal in surface impoundment	K,F
S03	<input type="checkbox"/>	storage in waste pile	L
D81	<input type="checkbox"/>	disposal by land application	M,F
D80	<input type="checkbox"/>	disposal in landfill	N,F
T03	<input checked="" type="checkbox"/>	treatment by incineration	O/P
T04	<input type="checkbox"/>	treatment in devices other than tanks, surface impoundments, or incinerators	Q

Other activities

GENERATOR	<input checked="" type="checkbox"/>	APPENDIX	GN
TRANSPORTER	<input type="checkbox"/>	APPENDIX	TR

3. Indicate any hazardous waste processes, by process code, which have been omitted from Part A of the facility's permit application.
4. Indicate any hazardous waste processes (by process code and line number on EPA Form 3510-3 page 1 of 5) which appear to be eligible for exclusion per 40 CFR 265.1(c). Provide a brief rationale for the possible exclusion.

Section B: GENERAL FACILITY STANDARDS: (Part 265 Subpart B)

YES NO NI* Remarks

1. Has the Regional Administrator been notified regarding: 265.12

a. Receipt of hazardous waste from a foreign source?

— ☒ — FACILITY DISPOSES

b. Facility expansion?

— ☒ — OF THEIR OWN

c. Change of owner or operator?

— ☒ — WASTE RESINS, ETC. ONLY.

2. General Waste Analysis: 265.13

a. Has the owner or operator obtained a detailed chemical and physical analysis of the waste?

☒ — — WASTE IS GENERATED
from process stream.

b. Does the owner or operator have a detailed waste analysis plan on file at the facility?

— — — W/ ALL COMPONENTS
KNOWN & COMPOSITES
ARE ANALYZED EVERY 2000

c. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?

— ☒ — WASTE IS GENERATED
ON SITE.

3. Security - Do security measures include: (if applicable) 265.14

a. 24-Hour surveillance?
or

☒ — — GUARDS & EMPLOYEES

b. i. Artificial or natural barrier around facility?
and

☒ — — FENCES & BLOCK

ii. Controlled entry?

☒ — — WALKS AROUND

c. Danger sign(s) at entrance?

☒ — — FACILITY.

4. Owner or operator inspections: 265.15

a. Does the owner or operator inspect the facility for malfunctions, deterioration, operator errors, and discharges of hazardous waste that may affect human health or the environment?

☒ — —

*Not Inspected

YES NO NI Remarks

b. Does the owner or operator have an inspection schedule at the facility?

✓ WEEKLY

c. If so, does the schedule address the inspection of the following items:

i. monitoring equipment?

✓

ii. safety and emergency equipment?

✓ MONTHLY / quarterly by company log supplier

iii. security devices?

iv. operating and structural equipment (i.e. dikes, pumps, etc.)?

✓

v. type of problems to be looked for during the inspection (e.g. leaky fitting, defective pump, etc.)?

✓

vi. inspection frequency (based upon the possible deterioration rate of the equipment)?

✓

d. Are areas subject to spills inspected daily when in use?

✓

e. Does the owner or operator maintain an inspection log or summary of owner or operator inspections?

✓ WEEKLY LOG BOOK

f. Does the inspection log contain the following information:

i. the date and time of the inspection?

✓

ii. the name of the inspector?

✓

iii. a notation of the observations made?

✓

iv. the date and nature of any repairs or remedial actions?

✓

5. Do personnel training records include: 265.16

a. Job titles?

✓ SEE TRAINING

b. Job descriptions?

✓ MANUAL

	YES	NO	NI	Remarks
c. Description of training?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d. Records of training?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
e. Did facility personnel receive the required training by 5-19-81?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
f. Do new personnel receive required training within six months?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	NO NEW TRAINEES SINCE
g. Do personnel training records indicate that personnel have taken part in an annual review of initial training?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. If required, are the following special requirements for ignitable, reactive, or incompatible wastes addressed? 265.17				
a. Special handling?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b. No smoking signs?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c. Separation and protection from ignition sources?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Block walls

Section C: PREPAREDNESS AND PREVENTION: (Part 265 Subpart C)

1. Maintenance and Operation
of Facility: 265.31

YES NO NI Remarks

Is there any evidence of fire,
explosion, or release of
hazardous waste or hazardous
waste constituent?

✓ — —

2. If required, does the facility
have the following equipment: 265.32

a. Internal communications or
alarm systems?

✓ — —

Fire Boxes & phones

b. Telephone or 2-way radios
at the scene of operations?

✓ — —

"

c. Portable fire extinguishers,
fire control, spill control
equipment and decontamination
equipment?

✓ — —

Indicate the volume of water and/or foam available for fire control:

8" line & hydrants from city water
35-40 CO₂ FOAM & DRY CHEMICAL EXTINGUISHERS

3. Testing and Maintenance of
Emergency Equipment: 265.33

a. Has the owner or operator
established testing and
maintenance procedures
for emergency equipment?

✓ — —

Suppliers CHE
EQUIP QUARTERLY

b. Is emergency equipment
maintained in operable
condition?

✓ — —

4. Has owner or operator provided
immediate access to internal
alarms? (if needed) 265.34

✓ — —

5. Is there adequate aisle space
for unobstructed movement?

✓ — —

6. Has the owner or operator attempted
to make arrangements with local
authorities in case of an emergency
at the facility?

✓ — —

Section D: CONTINGENCY PLAN AND EMERGENCY PROCEDURES: (Part 265 Subpart D)

YES NO NI Remarks

1. Does the Contingency Plan contain the following information: 265.52

a. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Counter-measures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.)

✓ — — IN PLAN

b. Arrangements agreed by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?

✓ — —

c. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?

✓ — —

d. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?

✓ — —

e. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)

✓ — — FIRE ALARMS only

2. Are copies of the Contingency Plan available at the site and local emergency organizations? 265.53

✓ — — FIRE & POLICE

YES NO NI Remarks

3. Emergency Coordinator 265.55

a. Is the facility Emergency Coordinator identified?

☒ YES ☐ NO ☐ NI

b. Is coordinator familiar with all aspects of site operation and emergency procedures?

☒ YES ☐ NO ☐ NI

c. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?

☒ YES ☐ NO ☐ NI

4. Emergency Procedures 265.56

If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?

☐ YES ☐ NO ☒ NI

Section I - USE AND MANGEMENT OF CONTAINERS (Part 265, Subpart I)

	YES	NO	NI	Remarks
1. Are containers in good condition? 265.171	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	ANY LEAKING DRUMS ARE REDRUMMED
2. Are containers compatible with waste in them? 265.172	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. Are containers managed to prevent leaks? 265.173	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. Are containers stored closed?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5. Are containers inspected weekly for leaks and defects.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. Are ignitable and reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive). 265.176	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	ignitable INVENTORY FROM BEFORE 5/81 BEING REDRUMMED.
7. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply). 265.177	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
8. Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Section O/P - INCINERATION AND THERMAL TREATMENT (40 CFR Part 265, Subparts O and P)

1. Determination of Steady State

I=incinerator T=thermal

a. Type of unit (i.e., type of incinerator or thermal treatment): INCIN
MODIFIED OIL FIRED BOILER

b. Components and steady state condition: I 265.343 T 265.373

Was each component at steady state prior to adding waste?

Component	YES	NO	NI	Remarks
<u>TEMP</u>	<u>✓</u>	<u> </u>	<u> </u>	<u>1600°F</u>
<u>O₂</u>	<u>✓</u>	<u> </u>	<u> </u>	<u>3% [O₂]</u>
<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>

2. Waste Analysis I 265.345 T 265.375

a. Minimum requirements, for wastes not previously burned/treated.

i. Required analyses; has an analysis been performed for the following?

Heating value

✓

Halogen content

 ✓

Sulfur content

 ✓

NO HALOGENS

OR Sulfur in

process streams.

ii. Has documented or written data been substituted for analysis of either:

Lead?

✓

Mercury:

✓

Every 20 days.

analyses rec'd
from outside lab.

THEY TEST FOR:
BTU, Hg, Pb, Cd, Co, Zn, Halogens

- b. List other parameters for which the waste is tested to enable owner or operator to establish steady state or determine the types of pollutants which may be emitted. (Note in Remarks any which you feel should be tested.)

	YES	NO	NI	Remarks
3. <u>Monitoring and Inspections</u> I 265.347 T 265.37				
a. Are combustion/emission control instruments monitored at least every 15 minutes?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>Continuous</u>
b. Is steady state maintained or corrections attempted?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c. Is stack plume observed at least hourly for normal color and opacity?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<u>Boiler exhaust stack clear except for startup on oil & it is observed.</u>
d. Did any stack observations made by owner or operator show a plume different than normal?**	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
e. If "yes" to (d) above, were corrections made to return emissions to normal appearance?**	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
f. Are the complete unit and associated equipment inspected daily for leaks, spills, and fugitive emissions?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
**Specify in Remarks for what period of time this was checked.				
g. Are emergency shutdown controls and system alarms checked daily for proper operation?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. <u>Open Burning</u> T 265.382 (open burning does not apply to incineration)				
a. Only complete this part if the facility open burns hazardous waste.				
i. Does this facility burn <u>only</u> waste explosives? (A <u>No</u> answer means <u>other</u> hazardous waste is open-burned).	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

YES NO NI Remarks

- ii. It this facility open-burns waste explosives, does it burn the waste at a distance greater than or equal to the minimum specified distance (below)



Pounds of waste explosives or propellants	Minimum distance from open burning or detonation to the property of others	
0 to 100.....	204 m	670 ft
101 to 1,000.....	380 m	1,250 ft
1,001 to 10,000.....	530 m	1,730 ft
10,0001 to 30,000.....	690 m	2,260 ft

Section A: Scope

1. Complete this Appendix if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

Section B: MANIFEST REQUIREMENTS (Part 262, Subpart B)

	YES	NO	NI	Remarks
(1) Does the operator have copies of the manifest available for review? 262.40	<input checked="" type="checkbox"/>			
(2) Examine manifests for shipments in past 6 months. Indicate approximate number of manifested shipments during that period. 22				
(3) Do the manifest forms examined contain the following information: (If possible, make copies of, or record information from, manifest(s) that do not contain the critical elements). 262.21				
a. Manifest document number?	<input checked="" type="checkbox"/>			
b. Name, mailing address, telephone number, and EPA ID number of Generator	<input checked="" type="checkbox"/>			
c. Name and EPA ID Number of Transporter(s)?	<input checked="" type="checkbox"/>			
d. Name, address, and EPA ID Number Designated permitted facility and alternate facility?	<input checked="" type="checkbox"/>			
e. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	<input checked="" type="checkbox"/>			
f. The total quantity of waste(s) and the type and number of containers loaded?	<input checked="" type="checkbox"/>			
g. Required certification?	<input checked="" type="checkbox"/>			
h. Required signatures?	<input checked="" type="checkbox"/>			
(4) Reportable exceptions 262.42				
a. For manifests examined in (2) (except for shipments within the last 35 days), enter the number of manifests for which the generator has NOT received a signed copy from the designated facility within 35 days of the date of shipment. - 0 -				
b. For manifests indicated in (4a), enter the number for which the generator has submitted exception reports (40 CFR 262.42) to the Regional Administrator. - 0 -				

Section C: PRE-TRANSPORT REQUIREMENTS (Part 262, Subpart C)

	YES	NO	NI	Remarks
1. Is waste packaged in accordance with DOT regulations? (Required prior to movement of hazardous waste off-site) 262.30	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<i>all Pb waste in steel drums.</i>
2. Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required for movement of hazardous waste off-site) 262.31 262.32	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. If required, are placards available to transporters of hazardous waste? 262.33	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
4. On-site accumulation of generated hazardous wastes. A HWMF may accumulate hazardous waste it generates either (A) in its storage facility [265.1(b)] or (B) in accordance with 40 CFR 262.34 [see 265.1(c)(7)]. Option B restricts all accumulation to tanks and containers. If the installation elects option A, check this box <input checked="" type="checkbox"/> and skip to Section D. If the installation elects option B, complete the following observations: See 40 CFR 262.34 January 11, 1982 Revision				
a. Is each container clearly marked with the start of accumulation date?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b. Have more than 90 days elapsed since the date inspected in (a)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c. Do wastes remain in accumulation tanks for more than 90 days?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d. Is each container and tank labeled or marked clearly with the words "Hazardous Waste"?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Section D: - RECORDKEEPING AND REPORTING (Part 262, Subpart D)

	YES	NO	NI	Remarks
1. Are all test results and analyses needed for hazardous waste determinations retained for at least three years? 262.40	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<i>so far</i>

Section E: - INTERNATIONAL SHIPMENTS (Part 262, Subpart E)

1. Has the installation imported or exported Hazardous Waste? 262.50	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(If answered Yes, complete the following as applicable.)				
a. Exporting Hazardous waste; has a generator:				

YES NO NI Remarks

- i. Notified the Administrator in writing?
- ii. Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country?
- iii. Met the Manifest requirements?
- b. Importing Hazardous Waste; has the generator met the manifest requirements?

✓ 4/82

✓

N/A

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS
Form 2 - Generator Inspection
262

I. General Information:

(A) Installation Name: REICHOLD CHEMICALS, INC.

(B) Street: 601 WOODWARD NTS. BLVD.

(C) City: FERNDALE (D) State: MICHIGAN (E) Zip Code: 48220

(F) Phone: 313 564 6500 (G) County: OAKLAND

(H) Operator: SAME

(I) Street: _____

(J) City: _____ (K) State: _____ (L) Zip Code: _____

(M) Phone: _____ (N) County: _____

(O) Owner: SAME

(P) Street: _____

(Q) City: _____ (R) State: _____ (S) Zip Code: _____

(T) Phone: _____ (U) County: _____

_____ Federal _____ Municipal x Private

(V) Type of Ownership: _____ State _____ County

(W) Date of Inspection: MARCH 9, 1981 Time of Inspection (From) 9:00 A.M. (To) 11:30 A.M.

(X) Weather Conditions: OVERCAST, 35°F, WINDS LIGHT, FROM SOUTHWEST

(1) Person(s) Interviewed	Title	Telephone
<u>MR. FRED TRUMPF</u>	<u>VICE PRESIDENT / PLANT MANAGER</u>	<u>313-564-6500</u>
_____	_____	_____
_____	_____	_____
(2) Inspection Participants	Title	Telephone
<u>DAVID HANSON</u>	<u>RESOURCE SPECIALIST, AIR QUALITY DIVISION</u>	<u>313 666 2700</u>
<u>SUSAN NORTON</u>	<u>WATER QUALITY SPECIALIST, WATER QUALITY DIVISION</u>	<u>313 379 9692</u>
_____	_____	_____

II. OTHER TYPE OF HAZARDOUS WASTE ACTIVITY

- | | |
|------------------------------------|--|
| (A) _____ Transporter (Form 3) | (B) _____ Chemical, Physical and Biological Treatment (Form 4) |
| (C) <u>X</u> Storage (Form 5) | (D) _____ Landfill (Form 6) |
| (E) <u>X</u> Incineration (Form 7) | (F) _____ Thermal Treatment (Form 7) |

(G) Comments: INCINERATOR RECENTLY PERMITTED - TEST BURN TO BE COMPLETED MARCH 9 OR
MARCH 10, 1981.

Supplemental forms (Listed in Parathesis) must be completed for each activity inspected. Attach all Supplemental forms to this report.

111. MANIFEST

	Yes	No	Not Inspected	See Remark Number
(A) Are copies of the Manifest available? 262.23(a)3	<u>X</u>			
(B) Does the Manifest contain the following information:				
1. Manifest document number? 262.21(a)1	<u>X</u>			
2. Name, mailing address, telephone number, and EPA ID Number of Generator? 262.21(a)2	<u>X</u>			
3. Name and EPA ID Number of Transporter(s)? 262.21(a)3	<u>X</u>			
4. Name, Address, and EPA ID Number of Designated permitted facility and alternate facility? 262.21(a)4	<u>X</u>			NO ALTERNATE FACILITY AVAILABLE
5. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)? 262.21(a)5 DOT information in CFR 49 172.101, 172.202 and 172.203	<u>X</u>			
6. The total quantity of waste(s) and the type and number of containers loaded? 262.21(a)6	<u>X</u>			
7. Required Certification? 262.21(b)	<u>X</u>			
8. Required Signatures? 262.23(a)1	<u>X</u>			
(C) Does the Owner or Operator Submit Exception Reports when Needed? 262.42	<u>X</u>			

IV. PRE-TRANSPORT REQUIREMENTS - 262 Subpart C

(A) Is Generator Packaging waste in accordance with DOT Regulations? 262.30 49 CFR Parts 173.178 and 179	<u>X</u>			
(B) Are waste packages marked and labeled in accordance with DOT Regulations concerning hazardous waste materials? 262.31 49 CFR Part 172	<u>X</u>			
(C) If required, are placards available to transporter? 262.33 49 CFR Part 172 Subpart F	<u>X</u>			

Yes	No	Not Inspected	See Remark Number
-----	----	---------------	-------------------

2) Pre-shipment Accumulation:

NOTE 1. WASTE STREAM WHICH IS SHIPPED OUT: TRICHLOR, CFC-SPEC RESINS, AND LEAD CONTAINING RESIN WASTE FROM CLEANING EQUIPMENT.

1. Are containers marked with start of accumulation date?
262.34(a)3 X
2. Are the containers of hazardous waste removed from installation before they can accumulate for more than 90 days?
262.34(a)1 If no, the facility must be storage or disposal facility 262.34(b) X

3. Are wastes stored in containers managed in accordance with 40 CFR Part 265.174 and 265.176 (weekly inspections of containers, containers holding ignitable or reactive wastes located at least 15 meters (50 Feet) from facility's property line? X

NOTE 2. CONTAINERS ARE INSPECTED; COMPANY CANNOT COMPLY WITH 50-FOOT LIMIT. PROPER -TY IS BOUNDED BY 8'-10' WALL.

4. Are wastes stored in tanks managed according to the following:

NOT APPLICABLE - ONLY RAW MATERIAL AND PRODUCT STORED IN TANKS. WASTES ARE ONLY STORED IN DRUMS.

- a. Are tanks used to store only those wastes which will not cause corrosion leakage or premature failure of the tank?

265.192(b)

- b. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structures?

265.192(c)

- c. Do continuous feed systems have a waste-feed cutoff?

265.192(d)

- d. Are required daily and weekly inspections done?

265.194

- e. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? (If waste is rendered non-reactive or non-ignitable, see treatment requirements?

265.198, 265.17

- f. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR §265.17(b) apply)

265.199

If generator is also a TSD, omit section V

	Yes	No	Not Inspected	See Remarks Number
A. Do Personnel training records include: 265.16				
1. Job Titles? 265.16(d)1	_____	_____	_____	_____
2. Description of Training? 265.16(d)3	_____	_____	_____	_____
3. Records of Training? 265.16(d)4	_____	_____	_____	_____
Is Personnel Training Completed within the Required Time Frame?	_____	_____	_____	_____
B. Preparedness and Prevention 265 Subpart C				
1. Maintenance and Operation of Facility:				
a. Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent? 265.31	_____	_____	_____	_____
2. Does the Facility have the following equipment?				
a. Alarm system? 265.32(a)	_____	_____	_____	_____
b. Telephone or 2-Way Radios? 265.32(b)	_____	_____	_____	_____
c. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment? 265.32(c)	_____	_____	_____	_____
Indicate the volume of water and/or foam available for fire control 265.32(d)				
Units: _____				
3. Testing and Maintenance of Emergency Equipment:				
a. Has the Owner or Operator established testing and Maintenance Procedures for Emergency Equipment? 265.33	_____	_____	_____	_____
b. Is emergency equipment Maintained in Operable Condition? 265.33	_____	_____	_____	_____

NOT APPLICABLE

Yes

No

Not
Inspected

See Remark
Number

4. Has Owner/Operator Provided
Immediate Access to Internal
Alarms (if needed)?
265.34(a)

5. Is there adequate Aisle Space
for unobstructed Movement?
265.35

6. Are arrangements with local
authorities included in the
operating record?
265.37

(C) Contingency Plan and Emergency
Procedure

1. Does the contingency plan
contain the following:

a. The actions facility personnel
must take to comply with §264.51
and 261.56 in response to fires,
explosions, or any unplanned
release of hazardous waste? (If the
owner has a Spill Prevention, Control
and Countermeasures (SPCC) Plan, he needs
only to amend that plan to incorporate
hazardous waste management provisions
that are sufficient to comply with
the requirements of this Part)

b. Arrangements agreed to by local
police departments, fire departments,
hospitals, contractors, and State and
local emergency response teams to
coordinate emergency services, pursuant
to §265.37?

c. Names, addresses, and Phone
numbers (office and Home) of all
persons qualified to act as emergency
coordinator.
265.52(d)

d. A list of all emergency
equipment at the facility which include
the location and physical description
of each item on the list, and a brief
outline of its capabilities?
265.52(e)

e. An evacuation plan for facility
personnel where there is a possibility
that evacuation could be necessary?
(This plan must describe signal(s)
to be used to begin evacuation,
evacuation routes and alternate
evacuation routes.

265.52(f)

	Yes	No	Not Inspected	See Remark Number
<i>NOT APPLICABLE</i>				
2. Are copies of the Contingency Plan available at site and local Emergency Organizations? 265.53	_____	_____	_____	_____
2. Emergency Coordinator 265.55				
a. Is the Facility Emergency Coordinator Identified?	_____	_____	_____	_____
b. Is Coordinator Familiar with all aspects of site operation and Emergency Procedures?	_____	_____	_____	_____
c. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	_____	_____	_____	_____
4. Emergency Procedures				
If an Emergency Situation has occurred at this facility; has the Emergency Coordinator followed the Emergency Procedures listed in §256.56?	_____	_____	_____	_____

VI. RECORDKEEPING

- (A) Are Manifests, Annual Reports, Exception Reports, and All Test Results and Analyses Retained for at least three years?
265.71(a)5

X

VII. INTERNATIONAL SHIPMENTS

- (A) Has the Installation Imported or Exported Hazardous Waste?
262.50

X

(If A was answered Yes, then complete one or both of the following)

1. Exporting Hazardous waste, *NOT APPLICABLE* has a generator:
- a. Notified the Administrator in writing?
262.50(b)1
- b. Obtained the Signature of the foreign consignee confirming delivery of the waste(s) in the foreign country?

Yes

No

Not
Inspected

See Remark
Number

NOT APPLICABLE

c. Met the Manifest requirements?

262.50(b)3

2. Importing Hazardous Waste,
has the generator:

262.50(d)

a. Met the manifest requirements?

VIII. PREPARER INFORMATION

Name: DAVE HANSON, RESOURCE SPECIALIST, AIR QUALITY DIVISION 313 666 2700

Title: SUE NORTON, WATER QUALITY SPECIALIST, WATER QUALITY DIVISION 313 399 9692

Phone Number: _____

REMARKS: _____

RCA INSPECTION REPORT - INTERIM STATUS STANDARDS
SUPPLEMENTAL FORM 5 FOR STORAGE FACILITY INSPECTIONS
265 - Subparts I, J, K, and L
1. General Information

(A) Facility Name: REICHOLD CHEMICALS, INC.
(B) Street: 601 WOODWARD HTS BLVD.
(C) City: FERNDALE (D) State: MICHIGAN (E) ZIP Code 48220
(F) Date of Inspection: MARCH 9, 1981

II. Storage Facility Standards (Part 265)

A. Facilities which store containers of hazardous waste (Subpart I) 265

	YES	NO	NOT IN-SPECTED	REMARK #
1. Are containers in good condition? 265.171	X	X		GENERALLY IN GOOD SHAPE SOME IN
2. Are containers compatible with waste in them? 265.172	X			MARGINAL CONDITION
3. Are containers stored closed? 265.173(a)	X			GENERALLY - WE SAW A FEW LEAKS
4. Are containers managed to prevent leaks? 265.173(b)	X			
5. Are containers inspected weekly for leaks and defects? 265.174	X			THE ONES THEY CAN SEE - SOME NOT ACCESSIBLE
6. Are ignitable & reactive wastes stored at least 15 meters (50 feet) from the facility property line? 265.176		X		SEE NOTE 2, PAGE 4, FORM 2
7. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply.) 265.177(a)			NOT APPLICABLE X	SEE FORM V, PAGE 3
8. Are containers of incompatible wastes separated or protected from each other physical barriers or sufficient distance? 265.177(c)			NOT APPLICABLE X	

B. Facilities which store hazardous waste in tanks (Subpart J) NOT APPLICABLE

1. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank? 265.192(b)				
2. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structures? 265.192(c)				

NOT APPLICABLE

YES

NO

NOT INSPECTED

DAMAGE

Do continuous feed systems have a waste-feed cutoff?	265.192(d)			
Are waste analyses done before the tanks are used to store a substantially different waste than before?	265.193(a)			
Are required daily and weekly inspections done?	265.194			
Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)	265.198			
Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR 265.17(b) apply.)	265.199			

Facilities which store hazardous waste in surface impoundments (Subpart K) 265

1. Do surface impoundments have at least 60 cm (2 feet) of freeboard?	265.222			
2. Do earthen dikes have protective cover?	265.223			
3. Are waste analyses done when the impoundment is used to store a substantially different waste than before?	265.225(a)			
4. Is the freeboard level inspected at least daily?	265.226(a)1			
5. Are the dikes inspected weekly for evidence of leaks or deterioration?	265.226(a)2			
6. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a surface impoundment? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)	265.299(a)1			
7. Are incompatible wastes stored in different impoundments? (If not, the provisions of 40 CFR 265.17(b) apply.)	265.230			

D. Facilities which store hazardous waste in waste piles (Subpart L) 265

1. Are waste piles covered or protected from the wind?	265.251			
2. Is each in-coming movement of waste analyzed before being added to the waste pile?	265.252			
3. Are leachate, run-off, and run-on controlled? (The effective date of this provision is Nov. 19, 1981.)	265.253			
4. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a pile? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)	265.256(a)1			

Continued on next page

NOT APPLICABLE

	YES	NO	NOT TESTED	NOT APPLICABLE
5. Are piles of reactive or ignitable waste protected? 265.256(a)				
6. Are incompatible wastes stored in different piles? (If not, the provisions of 40 CFR 265.17(b) apply.) 265.257(a)				
7. Are piles of incompatible waste protected by barriers or distance from other waste? 265.257(b)				

NOTE #1: AS OF MARCH 9, 1981, THE COMPANY DOES NOT MAINTAIN A MINIMUM OF 50 FEET FROM A PROPERTY LINE, THE REASON BEING THAT THEY HAVE HAD TO WAIT FOR AN APPROVED AIR QUALITY DIVISION PERMIT TO INSTALL AND OPERATE THEIR WASTE FUEL BOILER (INCINERATOR).

THEIR WASTE RESIN DRUM INVENTORY SHOULD BE INCINERATED WITHIN ONE YEAR. AT THAT TIME ANY WASTE SOLVENT OR RESIN STORED WILL BE AT LEAST 50 FEET FROM THE PROPERTY LINE.

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS
FORM 6 - LANDFILL INSPECTIONS

265 - Subpart N.

NOT APPLICABLE

I. General Information

- (A) Facility Name: _____
(B) Street: _____
(C) City: _____ (D) State: _____ (E) Zip Code: _____
(F) Date of Inspection: _____

II. Landfills

Yes	No	Not Inspected	See Rema Number
-----	----	---------------	-----------------

- (A) General Operating Requirements -
Does the facility provide the following:

*1. Diversion of run-on away from active portions of the fill? 265.302(a)

*2. Collection of run-off from active portions of the fill? 265.302(b)

*3. Is collected run-off treated? 265.302(b)

4. Control of wind disposal of hazardous waste? 265.302(d)

(* Effective 11-19-81)

- (B) Surveying and Recordkeeping -
Does the Operating Record Include:

1. A map showing the exact location and dimensions of each cell? 265.309(a)

2. The contents of each cell and the location of each hazardous waste type within each cell? 265.309(b)

265.11

FORM 7

RCRA INSPECTION REPORT-INTERIM STATUS STANDARDS
SUPPLEMENTAL FORM FOR THERMAL TREATMENT (AND INCINERATORS)

265 - Subparts P and O

I. General Information

(A) Facility Name: FEINWOLD CHEMICALS, INC.
 (B) Street: 601 WOODWARD HTS. BLVD.
 (C) City: FERNDALE (D) State: MICHIGAN (E) Zip Code: 48220
 (F) Date of Inspection: MARCH 9, 1981

II. Determination of Steady State

INCINERATOR NOT YET OPERATING

A. Type of unit (i.e., type of incinerator or thermal treatment): ECLIPSE BURNER FITTED TO
WICKS TUBE BOILER TO ACCEPT WASTE RESIN

B. Components and steady state condition: I 265.343 Th 265.373

Component	**** Was this component at SS prior to adding waste?			See Remark #:
	Yes	No	Not Inspected	
1. <u>TEMP. - 1600°F / OXYGEN NOT < 3%</u>			X	
2. _____			X	
3. _____			X	
4. _____			X	
5. _____			X	

III. Waste Analysis

265.13

A. Minimum requirements, for wastes not previously burned/treated.

1. Required analyses; has an analysis been performed for the following:	I	TH	Yes	No	Not Inspected	See Remark #:
a. Heating value	265.345	265.375			X	VARIABLE BTU CALCULATED
b. Halogen content					X	NO HALOGENS IN WASTES
c. Sulfur content					X	NO SULFUR EXCEPT IN THE REGULAR FUEL OIL TO BOILER.

2. Documented, written data may be substituted for analysis for these. Are either present for:

a. Lead: I 265.345 Th 265.375

b. Mercury?

Yes	No	Not Inspected	See Remark #:
	X	X	
	X	X	

3. Other parameters for which the waste is tested to enable owner or operator to establish steady state or determine the types of pollutants which may be emitted. (Note in Remarks any which you feel should be tested for.)

See Remark #:

1. _____
2. _____
3. _____
4. _____
5. _____

NOTE: AIR QUALITY PERMIT
REQUIRES HALOGEN LIMITS,
BTU CONTENT AND DESTRUCTION
EFFICIENCY CALCULATIONS BE
COMPLETED. THESE ARE ON FILE
WITH AIR QUALITY AND
REICHHOLD

IV. Monitoring and Inspections

NOT APPLICABLE BECAUSE INCINERATOR IS NOT ~~ON~~ OPERATING

	Yes	No	Not Insp.	See Remark #:
A. Combustion/emission control instruments monitored at least every 15 minutes? I 265.347(a)1 Th 265.377(a)1			X	
B. Steady state maintained or corrections attempted? I 265.347(a)1 Th 265.377(a)1			X	
C. Stack plume observed at least hourly for normal color and opacity? I 265.347(a)2 Th 265.377(a)2			X	
D. Did any stack observations made by owner or operator show a plume different than normal?*			X	
E. If yes to D above, were corrections made to return emissions to normal appearance?*			X	
F. Complete unit and associated equipment inspected daily for leaks, spills, and fugitive emissions? I 265.347(a)3 Th 265.377(a)3			X	
G. Emergency shutdown controls, system alarms checked daily for proper operation? I 265.347(a)3 Th 265.377(a)3			X	

* Specify in Remarks for what period of time this was checked.

V. Open Burning

NOT APPLICABLE

A. Only complete this part if the facility open burns hazardous waste.

- | | Yes | No | Not
Inspected | See Remark #: |
|--|-------|-------|------------------|---------------|
| 1. Does this facility burn
only waste explosives?
(A No answer means other
hazardous waste is open-
burned.) 265.382 | _____ | _____ | _____ | _____ |
| 2. If this facility open-
burns waste explosive,
does it burn the waste
at a distance greater
than or equal to the
minimum specified distance
(below)? 265.382 | _____ | _____ | _____ | _____ |

Inspector(s): _____

(Sign and Date)

Swan Norton - Mar 9, 1981
David L. Hanson, Jr. 3-9-81

265.382

Pounds of waste explosives or propellants	Minimum distance from open burning or detonation to the property of others
--	--

0 to 100.....	204 m 670 ft
101 to 1,000.....	380 m 1,250 ft
1,001 to 10,000.....	530 m 1,730 ft
10,001 to 30,000.....	690 m 2,260 ft

(1) Person(s) Interviewed

Title

Telephone

JOHN TENNEY

VICE PRESIDENT / PLANT MANAGER

313 564 6500

(2) Inspection Participants

Title

Telephone

SUSAN NORTON

WATER QUALITY SPECIALIST, WATER
QUALITY DIVISION

313 379 9692

DAVID HANSON

RESOURCE SPECIALIST, AIR QUALITY

313 666 2700

II. Description of Site Activity

(A) X Generator (Form 2)

(B) Transporter (Form 3)

(C) Chemical, Physical
and Biological Treatment (Form 4)

(D) X Storage (Form 5) <sup>SEE NOTE 1,
FORM 5, PAGE 3</sup>

(E) Landfill (Form 6)

(F) X Incineration (Form 7)

(G) Land Treatment (Form 4)

(H) Thermal Treatment (Form 7)

(I) Comments: THEY HAVE MODIFIED AN EXISTING STEAM BOILER w/AN ECLIPSE BURNER WHICH
WILL HANDLE WASTE SOLVENTS & RESINS - AS OF 3-9-81 THEY ARE NOT OPERATING THE
BOILER/INCINERATOR

Supplemental forms (Listed in Parathesis) must be completed for each activity inspected. Attach all Supplemental forms to this report.

Yes

No

Not
Inspected

See Remark
Number

(J) Has this facility
Submitted a Part A
Permit Application?

X

122.4

	Yes	No	Not Inspected	See P. Number
<p>(A) Has the Regional Administrator been notified regarding:</p> <p style="text-align: right;"><i>NOT APPLICABLE - THE COMPANY DOES NOT RECEIVE ANY WASTE.</i></p>				
1. Receipt of hazardous waste from a foreign source? 265.12(a)	<u> </u>	<u> </u>	<u> X </u>	<u> </u>
2. Transfer of Ownership? 265.12(b)	<u> </u>	<u> </u>	<u> X </u>	<u> </u>
(B) General Waste Analysis:				
or				
1. Has the owner operator obtained a detailed chemical and physical analysis of the waste? 265.13(a)	<u> X </u>	<u> </u>	<u> </u>	<u> </u>
or				
2. Does the owner operator have a detailed waste analysis plan on file at the facility? <i>NOT APPLICABLE</i> 265.13(b)	<u> </u>	<u> </u>	<u> X </u>	<u> </u>
3. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site? 265.13(c) <i>NOT APPLICABLE</i>	<u> </u>	<u> </u>	<u> X </u>	<u> </u>
(C) Security - Do security measures include: 265.14				
1. 24-Hour Surveillance? 265.14(b)1	<u> X </u>	<u> </u>	<u> </u>	<u> </u>
2. Artificial or Natural Barrier Around Facility? 265.14(b)2	<u> X </u>	<u> </u>	<u> </u>	<u> </u>
3. Controlled Entry? 265.14(b)2ii	<u> X </u>	<u> </u>	<u> </u>	<u> </u>
4. Danger Sign(s) at Entrance? 265.14(c)	<u> </u>	<u> X </u>	<u> </u>	<u> </u>
<i>"NO SMOKING" SIGNS PROMINENTLY POSTED</i>				
(D) Do Owner ^{or} Operator Inspections Include: 265.15				
1. Records of Malfunctions? 265.15(a)1	<u> X </u>	<u> </u>	<u> </u>	<u> </u>
2. Records of Operator Error? 265.15(a)1	<u> </u>	<u> </u>	<u> X </u>	<u> </u>
3. Records of Discharges? 265.15(a)1	<u> X </u>	<u> </u>	<u> </u>	<u> </u>
4. Inspection Schedule? 265.15(a)4	<u> X </u>	<u> </u>	<u> </u>	<u> </u>
5. Safety, Emergency Equipment? 265.15(b)1	<u> X </u>	<u> </u>	<u> </u>	<u> </u>
6. Security Devices? 265.15(b)1	<u> X </u>	<u> </u>	<u> </u>	<u> </u>
7. Operating and Structural Devices? <i>NOT APPLICABLE</i> 265.15(b)1	<u> </u>	<u> </u>	<u> X </u>	<u> </u>
8. Inspection Log? 265.15(d)	<u> X </u>	<u> </u>	<u> </u>	<u> </u>

	Yes	No	Not Inspected	See Remark Number
(E) Do Personnel Training Records Include: 265.16(d)				
1. Job Titles?	<u>X</u>	<u> </u>	<u>X</u>	<u> </u>
2. Description of Training?	<u> </u>	<u>X</u>	<u>X</u>	<u> </u>
3. Records of Training?	<u> </u>	<u>X</u>	<u>X</u>	<u> </u>
Is Personnel Training Completed within the Required Time Frame?	<u> </u>	<u> </u>	<u>X</u>	NOTE 1, FORM 1, PAGE 4

NOTE 1: THEY DON'T OPERATE WASTE BOILER AT PRESENT. PERSONNEL IDENTIFIED IN CONTINGENCY PLAN WILL HAVE TRAINING AND DOCUMENTATION IN FILES

(F) Are the Following Special Requirements for Ignitable, Reactive, or Incompatible Wastes Addressed? 265.17				
1. Special Handling?	<u>X</u>	<u> </u>	<u> </u>	IN CONTINGENCY PLAN
2. No Smoking Signs?	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
3. Separation and Confinement?	<u> </u>	<u> </u>	<u>X</u>	<u> </u>

IV. PREPAREDNESS AND PREVENTION - 265 Subpart C

(A) Maintenance and Operation of Facility:				
1. Is there any evidence of fire, Explosion, or release of hazardous waste or hazardous waste constituent? 265.31	<u> </u>	<u>X</u>	<u> </u>	<u> </u>
Does the Facility have the Following Equipment: 265.32				
1. Alarm System? 265.32(a)	<u>X</u>	<u> </u>	<u> </u>	LOCALIZED ALARM
2. Telephone or 2-Way Radios? 265.32(b)	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
3. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment? 265.32(c)	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
Indicate the volume of water and/or foam available for fire control: 265.32(d)				
Units:	<u>DRY POWDER AND CO₂ EXTINGUISHERS AVAILABLE - APPROX. 50 UNITS IN WASTE</u>			

STORAGE AREA: 12-INCH WATER LINE THROUGH WASTE STORAGE AREA

Yes

No

Not
InspectedSee Remark
Number(C) Testing and Maintenance of
Emergency Equipment:

265.33 Recordkeeping required under 265.15(b)1

1. Has the Owner or Operator
established Testing and
Maintenance Procedures
for Emergency Equipment?

X

2. Is Emergency Equipment
Maintained in Operable
Conditions?

X

- (D) Has Owner ^{or} Operator Provided
Immediate Access to Internal
Alarms (if needed)?

XLOCAL AUDIBLE
ALARMS, PHONE, FIRE
ALARM BOX TO FIRE
DEPT.

265.34

- (E) Is there Adequate Aisle Space
for Unobstructed Movement?

X

265.35

- (F) Are Arrangements with Local
Authorities Included in
the Operating Record?

XFIRE AND POLICE
DEPARTMENTS

265.37

V . CONTINGENCY PLAN AND EMERGENCY PROCEDURES - 265 Subpart D

- A) Does the Contingency Plan Contain the
Following Information:

1. The actions facility personnel
must take to comply with
§264.51 and 265.56 in response
to fires, explosions, or any
unplanned release of hazardous
waste? (If the owner has a Spill
Prevention, Control, and Counter-
measures (SPCC) Plan, he needs
only to amend that plan to
incorporate hazardous waste
management provisions that are
sufficient to comply with the
requirements of this Part.)

X

2. Arrangements agreed to by Local
police departments, fire departments
hospitals, contractors, and State
and local emergency response teams
to coordinate emergency services
pursuant to §265.37?

X

Yes

No

Not
InspectedSee Remark
Number

3. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?

X

265.52(d)

4. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?

X

265.52(e)

5. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes.)

X

265.52(f)

- (B) Are copies of Contingency Plan Available at Site and local Emergency Organizations?

X

265.53

- (C) Emergency Coordinator

265.55

1. Is the facility Emergency Coordinator identified?

X

2. Is Coordinator Familiar with all aspects of site operation and emergency procedures?

X

3. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?

X

- (D) Emergency Procedures

If an Emergency Situation has occurred at this facility; has the Emergency Coordinator followed the Emergency procedures listed in 256.56?

X

VI . MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING -265 Subpart E

~~NOT APPLICABLE - COMPANY DOES NOT RECEIVE WASTE~~

Yes

No

Not
Inspected

See Remark
Number

(A) Use of Manifest System

1. Does the facility follow the procedures listed in §265.71 for processing each Manifest?

N/A / X

2. Are records of past shipments retained for 3 years?
265.71(5)

N/A / X

- (B) Does the owner or operator meet requirements regarding Manifest Discrepancies?

265.72

N/A / X

(C) Operating Record

Does the facility maintain an operating record at the site as required in §265.73?

N/A / X

- (D) Availability, Retention and Disposition of Records

Are all records available at the site for inspection as required in §265.74?

N/A / X

VII . CLOSURE AND POST CLOSURE - 265 Subpart G and H

~~SECTION VII. NOT APPLICABLE~~

(A) Closure and Post Closure

1. Closure Plan Available for Inspection by May 19, 1981?
265.112(a)
2. Has this plan been submitted to the Regional Administrator?
265.112(c)
3. Has Closure begun?
265.112(c)
4. Is closure cost estimate available by May 19, 1981?
265.142

- (B) Post Closure Care and Use of Property
- Has the Owner, Operator supplied a Post Closure Monitoring Plan
(by May 19, 1981)?

265.117

GEN

RCRA LAND DISPOSAL RESTRICTION INSPECTION

GENERATOR CHECKLIST

GENERATOR REQUIREMENTS

A. BDAT Treatability Group - Treatment Standards Identification

1. F-Solvent Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

☒ Yes ☐ No ☐ NA

If yes, check the appropriate treatability group.

- ☐ Wastewaters containing solvents (less than or equal to 1% TOC by weight)
☐ Pharmaceutical wastewater containing
☒ spent methylene chloride
☐ All other spent solvent wastes

2. California List Wastes: Does the generator correctly determine the appropriate treatment standard of the waste? *MIT*

- a. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 50 but less 500 ppm, is the treatment in accordance with existing TSCA thermal treatment regulations for burning in high efficiency boilers (40 CFR 761.60) or incineration (40 CFR 761.70)?

☐ Yes ☐ No ☐ NA

If yes, specify the method: _____

- b. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 500 ppm, is the waste incinerated or disposed of by other approved alternate methods (40 CFR 761.60 (e))?

☐ Yes ☐ No ☐ NA

If yes, specify the method and state whether the facility has submitted a written request to the Regional Administrator or Assistant Administrator for an exemption from the incineration requirement:

B. Waste Analysis

1. F-Solvent Wastes

- a. Does the generator determine whether the F-solvent waste exceeds treatment standards?

☒ Yes ☐ No ☐ NA

How was this determination made?

- Knowledge of waste

☒ Yes ☐ No

If yes, note how this is adequate: Spent solvent (one active ingredient)

- TCLP

☐ Yes ☐ No

If yes, provide the date of last test, the frequency of testing, and note any problems. Attach test results.

- b. Does the F-solvent waste exceed applicable treatability group treatment standards upon generation [268.7(a)(2)]?

☒ Yes ☐ No ☐ NA

If yes, specify the waste stream:

FOO1a3

- c. Does the generator dilute the F-solvent waste as a substitute for adequate treatment [268.3]?

☐ Yes ☒ No ☐ NA

- d. How does the generator test F-solvent waste when a process or waste stream changes?

Commercial Lab.

2. California List Wastes

- a. Does the generator determine whether the waste is a liquid according to the Paint Filter Liquids Test (PFLT method 9095) as described by SW-846?

☐ Yes ☐ No ☐ NA

- b. If the waste is determined to be a liquid according to PFLT, is an absorbent added to the waste?

_____ Yes _____ No _____ NA

What type of absorbent is used? _____
Check the types of waste to which absorbent is added.

- _____ Liquid hazardous waste having a pH less than or equal to 2
- _____ Liquid hazardous waste containing HOCs in concentrations greater than or equal to 1,000 mg/L, but less than 10,000 mg/L
- _____ Liquid hazardous waste containing metals
- _____ Liquid hazardous waste containing free cyanides

- c. Does the generator determine whether the concentration levels (not extract or filtrate) in the waste equal or exceed the prohibition levels or whether the waste has a pH of less than or equal to 2.0 based on:

- Knowledge of wastes

_____ Yes _____ No _____ NA

If yes, note how this is adequate: _____

- Testing

_____ Yes _____ No _____ NA

If yes, list test method used: _____

- d. Does the generator determine if concentration levels in PFLT extract exceed cyanide and metals concentration levels?

_____ Yes _____ No _____ NA

- If yes, list test method used and constituent and concentration levels that exceeded prohibition levels: _____

- e. Does the generator dilute the waste as a substitute for adequate treatment [268.3]?

_____ Yes _____ No _____ NA

C. Management**1. On-Site Management**

Is waste that exceeds the treatment standards treated, stored, or disposed on-site?

☒ Yes ☐ No

If yes, the TSD Checklist must be completed.

2. Off-Site Management

- a. Does the generator ship any waste that exceeds the treatment standards to an off-site treatment or storage facility?

☒ Yes ☐ No

If yes, does the generator provide notification to the treatment or storage facility [268.7(a)(1)]?

☒ Yes ☐ No

If yes, does notification contain the following?

EPA Hazardous waste number(s) ☒ Yes ☐ No

Applicable treatment standards ☒ Yes ☐ No

Manifest number ☒ Yes ☐ No

Waste analysis data, if available ☒ Yes ☐ No

Identify off-site treatment or storage facilities: Petrochem Process, NE
ENV. WASTE Resources (off-state)

b

Does the generator ship any waste that meets the treatment standards to an off-site disposal facility?

☐ Yes ☐ No

If yes, does the generator provide notification and certification to the disposal facility [268.7(a)(2)]?

☐ Yes ☐ No

If yes, does notification contain the following?

EPA Hazardous waste number(s)	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Applicable treatment standards	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Manifest number	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Waste analysis data, if available	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Certification that the waste meets treatment standards	<input type="checkbox"/> Yes	<input type="checkbox"/> No

Identify off-site land disposal facilities: _____

- c. If the waste is subject to a nationwide variance (e.g., solvent-water mixtures less than 1%), extension (268.5), or petition (268.6), does the generator provide notification to the off-site disposal facility that the waste is exempt from land disposal restrictions [268.7(a)(3)]?

☐ Yes ☐ No ☐ NA

D. Treatment Using RCRA 264/265 Exempt Units or Processes
 (i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)

Are treatment residuals generated from units or processes exempt under RCRA 264/265?

☐ Yes

☒ No

No Residuals from exempt units.

If yes, list types of waste treatment units and processes:

_____ *boilers* _____

TSD

RCRA LAND DISPOSAL RESTRICTION INSPECTION

TSD CHECKLIST

TSD REQUIREMENTS

A. General Facility Standards

1. Does the waste analysis plan cover Part 268 requirements [264.13 or 265.13]?

o F-solvent ☐ Yes ☒ No ☐ NA
o California List ☐ Yes ☐ No ☒ NA

2. Does the facility obtain representative chemical and physical analyses of wastes and residues?

☒ Yes ☐ No

a. What date was the waste analysis plan last revised? _____

b. Are analyses conducted on-site or off-site?

☐ On-site ☒ Off-site

Identify off-site lab: _____

- c. Is F-solvent waste analyzed using TCLP?

☐ Yes ☒ No ☐ NA

d. Describe the frequency of sampling: _____

e. Describe procedures used to identify manifest discrepancies: _____

3. Are the operating records, including analyses and quantities, complete [264.73/265.73]?

☒ Yes ☐ No

B. Storage (268.50)

1. Are restricted wastes stored on-site?

☒ Yes ☐ No

If no, go to C, Treatment in Surface Impoundments.

2. If yes, check the appropriate method.

☒ Tanks
☒ Containers

3. Are all containers clearly marked to identify the contents and date(s) entering storage?

☒ Yes ☐ No ☐ NA

4. Do operating records track the location, quantity of the wastes, and dates that the wastes enter and leave storage?

☒ Yes ☐ No

5. Do operating records agree with container labeling?

☒ Yes ☐ No ☐ NA

6. Have wastes been stored for more than 1 year since the applicable LDR regulations went into effect?

☐ Yes ☒ No ☐ NA

If yes, can the facility show that such accumulation is necessary to facilitate proper recovery, treatment, or disposal?

☐ Yes ☐ No

If yes, state how:

7. Have tanks been emptied at least once per year since the applicable LDR regulations went into effect?

____ Yes ____ No ____ NA

If yes, do the operating records show that the volume of waste removed from tanks annually equals or is more than the tank volume?

____ Yes ____ No

8. Are all tanks clearly marked with a description of the contents, the quantity of wastes received, and date(s) entering storage, or is such information recorded and maintained in the operating record?

____ Yes ____ No ____ NA

C. Treatment

No Treatment on-site of LBR wastes

1. Does the facility treat restricted wastes other than in surface impoundments?

____ Yes ____ No

If no, go to D, Treatment in Surface Impoundments.

2. Describe the treatment processes:

3. Does the facility, in accordance with an acceptable waste analysis plan, determine whether the residue from all treatment processes is less than treatment standards [268.7(b)]?

____ Yes ____ No

4. Describe frequency of testing treatment residuals:

5. Is dilution used as a substitute for treatment?

____ Yes ____ No

Inspection Priorities for RCRA Interim Status Financial Responsibility Requirements

1.

265.140(c) Is this a State or Federal Facility? **NO**

FINANCIAL ASSURANCE REQUIREMENTS

265.142(a) Is the written closure cost estimate available? **✓ yes**

265.144(a) Is the written post-closure cost estimate available? **N/A**

265.142(c) Have any revisions been made to the closure/post-closure cost estimates which increase the cost of closure/post-closure? **NO**

265.142(d) Have the closure/post-closure cost estimates been revised to reflect the increased cost of closure/post-closure? **N/A**

265.142(b) Have the closure/post-closure cost estimates been updated to the current year by either recalculating the cost estimates or using an inflation factor derived from the most recent Implicit Price Deflator from the U.S. Department of Commerce? **yes**

Note: The annual Implicit Price Deflator covers the period from April 1987 to April 1988 (for example) and can be obtained from the Commerce Department Library in Chicago, (312) 353-4450.

1980 - 85.7	1984 - 108.1
1981 - 97.0	1985 - 111.7
1982 - 100.0 base year	1986 - 114.5
1983 - 103.8	1987 - 116.4

265.143 Which financial instrument(s) is used to assure closure/post-closure care costs?

	<u>Closure</u>	<u>Post-Closure</u>
	<input type="checkbox"/> Trust Fund *	<input type="checkbox"/> Trust Fund *
	<input type="checkbox"/> Surety Bond*	<input type="checkbox"/> Surety Bond*
	<input checked="" type="checkbox"/> Letter of Credit*	<input type="checkbox"/> Letter of Credit*
	<input type="checkbox"/> Insurance*	<input type="checkbox"/> Insurance*
	<input type="checkbox"/> Financial Test	<input type="checkbox"/> Financial Test
	<input type="checkbox"/> Corporate Guarantee	<input type="checkbox"/> Corporate Guarantee
265.143(f)	<input type="checkbox"/> Combination of above*	<input type="checkbox"/> Combination of above*
265.145(f)	Specify:	Specify:
265.143(g)	<input type="checkbox"/> One instrument for multiple facilities	<input type="checkbox"/> One instrument for multiple facilities
265.145(g)	specify:	specify:

- 265.146 Has the owner or operator used one instrument for financial assurance of both closure and post-closure care? *NA*
- 265.142 Does the amount of the financial assurance instrument(s) equal
265.144 or exceed the current closure/post-closure cost estimates? *yes equal*
- 265.150 Has the State assumed responsibility for the facility's compliance with closure/post-closure care requirements? *NO*

LIABILITY REQUIREMENTS

- 265.147(a) Does the owner or operator have coverage for sudden accidental occurrences in an amount of at least \$1 million per occurrence with an annual aggregate of at least \$2 million, exclusive of legal defense costs? ☒

- 265.147(a) What is the method of coverage?

☒ Insurance

☐ Hazardous Waste Facility Endorsement, or

☐ Certificate of Liability Insurance

☐ Financial test.

☐ Corporate Guarantee

☐ Combination of financial test or corporate guarantee and insurance

- 265.147(b) ☒ Does the owner or operator of a surface impoundment, landfill, or land treatment facility which is used to manage hazardous waste have coverage for nonsudden accidental occurrences in the amount of at least \$3 million per occurrence with an annual aggregate of at least \$6 million, exclusive of legal defense costs?

- 265.147(b) What is the method of coverage? ☒

☐ Insurance

☐ Hazardous Waste Facility Liability Endorsement, or

☐ Certificate of Liability Insurance

☐ Financial test

☐ Corporate guarantee

☐ Combination of financial test or corporate guarantee and insurance

- 265.147(e) After receiving final closure certifications from the owner or operator and an independent registered professional engineer, has the Director notified the owner or operator in writing that the owner or operator is no longer required to maintain liability coverage?
- 265.150 Has the State assumed responsibility for the owner's or operator's compliance with the liability requirements for sudden and/or nonsudden accidental occurrences?

Depending on the division of responsibility between the district offices and the central office in Lansing, the following may apply to a CEI inspection:

- 265.143 Does the wording of all financial instrument(s) match that
 265.145 in 264.151 and identify the Director of MDNR rather than the U.S. EPA Regional Administrator? *yes*
- 265.143(a) Are the closure/post-closure cost estimates calculated according to
 265.145(a) Federal and State requirements? *yes*
- 265.143 Have the procedures regarding the financial instrument(s) been
 265.145 followed? *yes*